

IESO Stakeholder Engagement Foundation Working Group (FWG)

Meeting #5 Summary

Date held: September 16, 2015	Time held: 8:30 – 11:30 AM	Location held: IESO Offices, 120 Adelaide Street W, Toronto, ON
Working Group Members, Observers and Guests	Company Name	Attendance Status (A)ttended; (R)egrets; (S)ubstitute; (P)hone Participant
Adam White	Aitia Analytics	R
Jeff Evenson	Canadian Urban Institute	A
Rob Kerr	City of Guelph	P
Sarah Griffiths	EnerNOC, Inc.	R
Jennifer Gordon	Halton Hills Hydro	R
Brian Lennie	Horizon Utilities	R
Sally Barakat	Hydro Ottawa	A
Zoran Stojanovic	London Hydro	A
Karen Carter	Ministry of Education	A
Guy Newsham	National Research Council	R
Jessica Webster	National Resources Canada	R
Marisa Uchin	Opower	A
Christine Dade	Horizon Utilities	R
David Craig	PricewaterhouseCoopers LLP	A
Gord Ellis	Soft Grid Analytics Corporation	A
Kevin Myers	Veridian	A
Brian Byrnes (Observer)	Ministry of Energy	R
Janet Gore (Observer)	Information & Privacy Commissioner	A
Renee Barrette (Observer)	Information & Privacy Commissioner	R
Jason Herod	Just Energy	A
Foundation Project Team	Company Name	Attendance Status (A)ttended; (R)egrets; (S)ubstitute; (P)hone Participant
Lisa Barnet	IESO	A
David Barrett	IESO	A
Simon Geraghty	IESO	A
Bob Guberman	IESO	A

Ryan King	IESO	A
Julia McNally	IESO	A
Chris Tuff	IESO	A

Please note that the views represented in the summary below reflect the diverse views of members of the FWG and not necessarily those of the IESO. Links to the presentation materials are provided with each item.

Item 1 Introduction/Opening Remarks

- This meeting was the last in-person meeting of the Foundation Working Group
- The IESO Foundation project team thanked all the members and observers for their valuable contributions
- Goal for meeting was to finalize the FWG’s recommendations on Third Party Access and Data De-identification

Item 2 Discussion – Third Party Access: Draft Framework

http://www.ieso.ca/Documents/consult/Foundation/Foundation-20150916-Third_Party_Access_Framework_Proposal.pdf

- The members of the FWG mentioned the importance of the terms and conditions for Third Party Access and recommended that stakeholdering these terms and conditions with the LDCs would be beneficial. The IESO noted that the negotiations of the terms and conditions would be between the parties to the agreement. However, the IESO agrees that FWG members may identify specific concerns that they would want to see included in the negotiations between the parties to the agreement.
- Members discussed situations that would require personal information to be used, such as for energy maps for regional or municipal planning. A member also noted that for energy maps, granular data including personal information may be needed for matching data sets, and in some cases the matched data can then be de-identified for use in the analysis. LDC members reiterated that while there may be useful reasons to disclose personal information, each customer owns their data and access to it by third parties from LDCs would require either the customer’s consent or a legal/ regulatory requirement compelling LDCs to share the personal information.
- The IESO committed to incorporating the different opinions within the FWG with respect to access to personal information into the Third Party Access recommendation. A final decision regarding third party access to personal information would have to be made prior to implementation. The revised recommendation is to be distributed to the FWG for further feedback following this meeting. The subsequent feedback received from FWG members and the IESO’s responses are summarized in the appendix to this meeting summary.

Item 3 Discussion – De-identification: Draft Framework
http://www.ieso.ca/Documents/consult/Foundation/Foundation-20150916-Proposed_De-identifying_Information_Framework_Recommendation.pdf

- A working group member suggested either attaching a glossary to the recommendations for defined terms or consistently defining the appropriate terms in each document.
- A working group member suggested that it be explicitly stated that whoever receives the data, in addition to the data requestor, also be bound by the terms and conditions. The IESO clarified that there are provisions in the recommended Third Party Access framework that require the data requestor to pass on these provisions to all other recipients of the data.
- A working group member suggested the following changes be made to the typical examples of “threat”, “vulnerability” and “adversary” contained in the De-identification Context and Assumptions section of the document
 - for “vulnerability”, replace “inadequate system architecture around authentication” with “inadequate controls”
 - for “threat”, replace “public place.” with “manner that may compromise controls.”
 - for “adversary”, replace “steal information to use in unauthorized or illegal ways.” to “compromise the integrity of the information.”
 - to clarify that these are only examples, denote each with “e.g.”
- The IESO acknowledged it would consider the suggested changes to the Data De-identification recommendation. The revised recommendation is to be distributed to the FWG for further feedback following this meeting. The subsequent feedback received from FWG members and the IESO’s responses are summarized in the appendix to this meeting summary.

Item 4 Wrap-up and Next Steps

The IESO reviewed the proposed schedule for key project milestones through the end of October:

- September 16th PM – Revise Recommendations and e-Mail to FWG members
- September 17th – Receive Feedback from FWG members on Revisions
- September 17th COB – Distribute Foundation Materials for Stakeholder Advisory Committee (SAC)

- October 1st – Present Foundation Recommendations to the SAC for Input
- October 1st – Post Foundation Recommendations to IESO Website for Public Comment Period
- October 20th – Send Revisions of Foundation Recommendations to FWG members (if necessary)
- October 21st – Conference Call with FWG Members to Approve Revised Foundation Recommendations (if necessary)
- October 29th – Open Public Session to Rollout Final Recommendations of the Foundation Project

Appendix – Post Meeting Feedback on Recommendations

At the September 16th meeting of the Foundation Working Group (FWG) the IESO took an action item to update the Framework for Third Party Access (TPA framework) and the Framework for Data De-identification recommendation documents and distribute them back to the FWG for further comments and suggested changes. This appendix provides the feedback received from the FWG members and the IESO's responses to each item. IESO responses are *italicized*.

Framework for Third Party Access

FWG Member Feedback

One of the local distribution company (LDC) FWG members expressed the view that the LDC community is willing to work directly with third parties who would require access to the personal data, but that the principle concern is that third parties would be accessing this data without prior knowledge or consent of the LDC.

IESO Response

IESO incorporated this concern into the TPA framework, limiting the expressed view to be that of the organization providing the feedback.

FWG Member Feedback

Other LDC FWG members emphasized the importance of not only of protecting their customers' personal information, but also that any disclosure should be in compliance with legislative and regulatory requirements, or with customer consent.

IESO Response

The IESO has incorporated this position in the TPA framework.

FWG Member Feedback

An FWG member suggested wording changes to highlight the importance of municipal energy plans in the section discussing use cases where personal information was required.

IESO Response

The suggested changes were added to the TPA framework.

FWG Member Feedback

An FWG member asked that the TPA framework highlight the fact that the framework is directed at third parties and not entities that work as an agent of a local distribution company.

IESO Response

The IESO believes this addition was meant to clarify that an organization under contract with an LDC, carrying out work on its behalf and getting customer data from the LDC, would not be considered a third party under the TPA framework. Such sharing of information is not addressed in the TPA framework. However, were such organizations to get data directly from the data custodian, they would be considered a third party and would be subject to the TPA framework. To clarify this distinction the IESO substituted the sentence below into the document and moved its location to an earlier part of the introduction.

“The Framework would only apply to the Data Custodian; however, LDCs may have access to the same information in their own jurisdictions and may be able to share this information with their authorized agents.”

Framework for Data De-identification

FWG Member Feedback

An FWG member suggested that the terms “requestor”, “recipient”, “user” and “agent” be made defined terms and be capitalized in the document.

IESO Response

The terms “Requestor”, “Recipient” and “Individual User” (“user” is not meant to be a defined term, whereas “Individual User” is) were made defined terms and capitalized throughout the document. The term “agent” was not defined as its use throughout the materials is felt to be too broad, and the term can be used different ways by different organizations.