

Smart Metering Entity (SME) Licence Order Working Group Meeting Minutes – Meeting #9 – October 27th, 2016

Representative	Organization	In attendance	Regrets
Doug Thomas	IESO, Steering Committee	X	
Sorana Ionescu	IESO, Steering Committee	X	
Mag Wadie	IESO, Co-Chair	X	
Michel Provost	Hydro Ottawa, Co-Chair	X	
Jim Murphy	IESO, WG Project Manager	X	
Gissella Lopez	IESO, WG Scribe	X	
Anita Joshi	IESO, Legal Counsel	X	
Adrian Pye	IESO, Regulatory Affairs		X
Dean Dohring	IESO	X	
Krista Perry	Guelph Hydro	X	
Rob Rohr	Horizon	X	
Tracy Manso	Entegrus	X	
Jennifer Gordon	Halton Hills Hydro	X	
John Dunne	Hydro One	X	
Sally Barakat	Hydro Ottawa	X	
Kevin McCauley	Kingston Hydro		X
Eddie Augusto	Powerstream	X	
Andy Armitage	Thunder Bay Hydro		X
Warwick Tichbon	Toronto Hydro		X
Kevin Myers	Veridian	X	
Marianne Blasman	Waterloo North Hydro	X	
Geoff Visentin	Fortis Ontario	X	
Afreen Khan	EDA	X	
Justin Rangooni	EDA		X
Viive Sawler	OEB	X	
Irina Kuznetsova	OEB	X	
Richard Lanni	OEB	X	
Michael Beare	Ministry of Energy		X
Ryan Zade	Ministry of Energy		X
Brett Smith	Ministry of Energy	X	
Tim Short	Enbridge Gas		X
Tim Catton	Union Gas		X

Review of the Agenda and Meeting Objectives

- The Co-Chairs reviewed the agenda; it was approved with no changes.

Review and Approval of Minutes from Meeting # 8

- The Working Group accepted the minutes with no additional comments.

New Data Elements Collection and Reporting Update

- The SME confirmed the following with respect to the MDM/R code updates:
 - The Code required for the Order implementation was deployed in the MDM/R Production environment on October 2nd, 2016.
 - LDCs can continue to test in the Sandbox environment where all validations for the four fields are enabled.
 - The MDM/R Production environment has validations enabled for Distributor Rate Class, Commodity Rate Class and Occupant Change, as previously agreed, Postal Code validation will take effect on January 1st, 2017.
- An LDC Project Progress Reporting Dashboard has also been uploaded in the “LDC Metrics Dashboard” available in the Service Desk Tool. It contains a series of graphs showing LDC’s progress with the synchronization of the four defined fields for their active Service Delivery Points.
- According to this progress report, as of October 26th, 2016, 13% of all active SDPs contain a valid Postal Code, less than 1% of the active SDPs have an active Distributor Rate Class, Commodity Rate Class and/or an Occupant Change.
- The view for each LDC is exclusively of their data.
- Starting in January, 2017 on the first business day of every month, a ticket with the specific list of Universal SDPs that do not contain the required fields will be sent to each applicable LDC.
- Two LDCs inquired if they can request the report with the list of Universal SDPs prior to January, 2017. The SME confirmed that LDCs who have completed their transition yet find a discrepancy with the data in the Dashboard can reach out to the SME before January, 2017 and the report can be run for them.

Third Party Access Implementation Plan Update

- The IESO received a letter from the firm Aird & Berlis LLP, representing the Coalition of Large Distributors (CLD), citing two concerns related to the Plan:
 - The risk of re-identification of individuals in areas in which the resident is the sole resident in such area (i.e. the 6 digit Postal Code represents only one premise)
 - The scope and determination of the disclosures permitted to Third-Party Recipients.
- During a meeting with the IPC, the LDCs and their legal counsel, the SME explained the approach adopted for the project as well as the results of the privacy analysis conducted by the firm Privacy Analytics. Follow up questions raised by the IPC were addressed by the SME.
- Following the recommendation by the IPC, the SME is requesting that LDCs who may have instances of single residential premise in a six character postal code should use "W8W8W8" as the postal code for these premises, for as long as this unique condition exists.

- A number of LDCs, including Waterloo North, Power Stream, Halton Hills Hydro and Hydro One raised the concern of implementing this additional requirement in their CIS particularly at this stage of the project implementation.
- LDCs inquired if the SME could instead implement the logic in the MDM/R and avoid the need for this provision in each CIS system. The SME clarified that the concern raised by the group of LDCs was specifically about sending those records to the MDM/R. Since the MDM/R should not collect those records, the LDCs need to mask them in their system prior to submitting to the MDM/R.
- Some LDCs inquired about the validity of the concern for this Phase of the project given that the recipient of the data is only the IESO. These LDCs mentioned that their understanding was that the next phase of the project would define the disclosure terms and methodology for Third Party Access where more restrictive measures will be established.
- The SME stressed that they have explained to the IPC and the LDCs, who brought about the concern, the following specific facts:
 - Phase 1 is specific to the IESO being the sole recipient of the data
 - Phase 2 will analyze the data collected, after a 6 months period, to validate the analysis completed in Phase 1.
 - Third Party Access will only be granted after extensive design of a disclosure framework that will involve the privacy consultant, the IPC and the LDCs.
- The SME explained that a decision had to be made to address the concern and reiterated that with respect to third party access a next stage of the initiative will take place, with Phase II of the privacy analysis performed on actual data. Methods and restrictions for access to such data by Third Parties would also be part of the next stage of the project.
- Other questions and concerns brought up by the LDCs were:
 - The ability to temporarily apply a global solution using a tool in the MDM/R to identify those cases until LDCs can implement their solution. To which the SME responded that in addition to technical challenges, and not aligning with the IPC recommendation, the existing tool available in Canada Post is incomplete and non-conclusive, and there is additional information in an LDC's system that is required to properly identify the scenarios e.g. smart meter installed in the premise.
 - The possibility of sending only 5 digits to the MDM/R given that the LDC does not have logic in place to programmatically manage it in the CIS. The SME explained that the conclusion was to collect 6 digit Postal Codes for the purposes of valuable future data analytics and a consistent solution for all LDCs.
 - The potential of missing the OEB Order timelines if this system change needs to be implemented was raised by a number of LDCs. The SME agreed that it is unfortunate that this concern was brought up several months after an approach was discussed and socialized in the group by June 2016.
 - The need for LDCs to discuss with their Regulatory group before deciding on a solution, since their perspective might be that the IESO is a Third Party. The SME explained that although there is never a zero risk, the analysis of the Privacy Consultant gave the clarity that the risk was acceptable with respect to re-identification of a single premise by someone at the SME.

- Whether the SME could follow the same approach taken for Premise Address or City by masking the value. One LDC explained that they need the full Postal Code in the synchronization file for other internal LDC processes. The SME mentioned that the masking of the Premise Address or City is done globally and before the data is stored in the system, whereas masking specific postal codes implies collection, validation and then masking of the data.
- The potential of additional changes if future assessments or privacy concerns determine that there is also a risk for Postal Codes with 2 or 3 premises. The SME explained that the concern raised by the CLD was specific to a one-to-one relationship; nevertheless flexibility should be kept in mind as the project goes into Phase II. LDCs should have internal discussions to define their solution to meet the requirement, while recognizing the recommendations of the Privacy Consultant that aimed to provide a consistent and science based assessment for Province wide data.
- An LDC inquired if the SME can continue to receive all Postal Codes and provide the assurance to LDCs that it will not expose those with only one premise or with a high risk. The SME affirmed that the assurance remains in the fact that there will be a framework for Third Party Access discussed and established with the LDC community and at this time the SME is not sharing any data, however the IPC recommendation must be addressed.
- To a question about the availability of historical Postal Codes representing a single premise for future Third Party Access, to which the SME commented that any data to be shared with third parties will be based on its status at that point in time, in addition to the fact that restrictions will be set based on the framework for Third Party Access.
- An LDC proposed using a value other than W8W8W8 if there is an expectation that W8W8W8 needs to be addressed and resolved by LDCs. The SME mentioned that there is no expectation to have zero premises with the default Postal Code. There is an expectation of accuracy of the data however the cases for W8W8W8 will always represent those premises where a Postal Code has not been assigned (e.g. new subdivisions).
- The SME explained that, to address the IPC recommendation, it will proceed to update the MDM/R Synchronization Technical Interface Specifications reflecting this additional expectation with the intention of publishing the revision by November 4, 2016
- The implementation plan for the OEB Order remains unaltered and the SME committed to send a communication to all LDCs informing them of the concern raised by the CLD and the required approach to mitigate such concern by end of day on October 31, 2016.
- Some LDCs raised the concern that there might be additional issues or impacts to meet the established timelines by the OEB Order while meeting the requirements of the IPC recommendation. It was suggested that LDCs need to review internally and evaluate next steps.

- With respect to the second concern raised by the law firm representing the CLD, the SME explained to the IPC that Third Parties will not have access to any data until the detailed framework has been finalized, the necessary tools and resources are put in place, and a clear disclosure determination policy has been reviewed and published. Those aspects are included in Phase II in the Privacy Analysis and described in the Implementation Plan submitted to the OEB.

Communications Calendar and Project Timeline Update

- Communication Activities are on schedule.
- A webinar will take place on November 15th to update the LDC community on the progress to date of the OEB Order implementation plans.
- All Project tasks are also on schedule. Any changes to the current LDC transition plans to synchronize their data elements can be communicated to the SME via Service Desk Tool.

Meeting Conclusions, Next Meeting Planning

#	Date	Action
1	Oct 31 -2016	The SME will send a communication to all LDCs informing of the change required to address the IPC recommendation.
2	Nov 4-2016	The SME will update the MDM/R Synchronization TIS to reflect the requirement of synchronizing "W8W8W8" for instances where a single residential premise is the only premise in the six digit postal code.
3	Nov 15- 2016	The SME will have a webinar to update LDCs on the progress to date.
5	On going	LDCs will submit Ad-hoc requests for a detailed Universal SDP report prior to January, 2017 if the LDC believes that they have synchronized all their SDPs but there is a discrepancy with the data in the dashboard.

Next Meeting: November 29th, 2016	Time: TBD	Location: 120 Adelaide St West, Toronto
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