**Meeting Summary**

|  |
| --- |
| **OEB Smart Grid Working Group** |

|  |  |  |  |
| --- | --- | --- | --- |
| **Meeting Date:** | November 29, 2012 | **Time:** | 9:30 am – 4:45 pm |
|  |  |  |  |
| **Location:** | 2300 Yonge Street, 25th Floor, ADR room |

**Board Staff:** Russ Houldin, Rachel Anderson, Roy Hrab

**Meeting Topic:** Development of smart grid guidance in light of the [Report of the Board – A Renewed Regulatory Framework for Electricity Distributors: A Performance Based Approach](http://www.ontarioenergyboard.ca/OEB/_Documents/Documents/Report_Renewed_Regulatory_Framework_RRFE_20121018.pdf)

The purpose of the third meeting of the reconvened Smart Grid Working Group (SGWG) was to discuss staff’s revised proposal for guidance on smart grid implementation which consisted of five categories. For the categories ‘Customer Focus: Energy Services and Education’, ‘Operational Effectiveness and Network Evolution’, the working group was divided into three smaller groups for discussion; the key issues arising from each groups’ discussion were then discussed among the entire working group. For these sections the meeting notes are divided according to group. For the discussion of ‘Privacy and Cyber-security’, ‘Innovation’ and ‘Economic Development’ the group was not divided and so the meeting notes remain organized into the four categories of working group members.

***Energy Services and Education for Customers***

**Key observations from the discussion:**

1. A common understanding of what ‘real-time’ means in regards to data access would be useful e.g. 3 second vs. 30 second latency, what is appropriate for Ontario?

**Discussion notes:**

|  |  |
| --- | --- |
| ***Group 1*** *(utilities, consumer groups, and agencies)* | * Most of discussion focused on proposed expectations on real time data; understanding of switching from two separate options to a new option: utilities will allow customers and 3rd parties to access the real time data with some sort of methodology to access smart meters (from a residential purpose)
* Some customers are able to access near real-time data now through pulse outputs, important not to lose that functionality going forward.
* Didn’t define what is meant by real-time data, is this 3 seconds or longer, etc.?
* Anything approaching 30 seconds is too long to be valuable. If the customer is to react to flicking a switch and seeing the impact, need to see a change of what they are seeing on the meter for a few seconds. Can see 6 seconds updates on the meter; working with this would be ideal
* Give people the option to see the impact of their options using Peaksaver Plus. If the delay is too long, they won’t see the impact
* Standard on Peaksaver Plus was 60 seconds for real time to work with early generation smart meters. This value has already been established, however, near real time is obviously better and we shoot for that.
* Agree there are a lot of details that still require working out. . .
* Need to ensure that if access was provided to meter data, then it is only the customer device that was purchased that can access the data. Don’t want another group to come by with another device to access data. This may require utilities to update devices to use these systems
* Not just about enabling a meter to use zigbee. How do you ensure that when a customer uses a device, the customer cannot see other devices? Need to pair them
* If the device is broadcasting information, how do you prevent others from accessing this information?
* Like pairing a blue tooth headset to a phone
* But how does customer find out the code without calling the utility? Can’t just put it on the meter
* Utility has to turn it on, give you the code and the consumer uses the code with 3rd party services
* May be helpful for LDCs with same meters to work on the same education materials
* Environmental benefits - Would appear that policy would like to enable for things with traditional cost effectiveness tests may not result in approvals being made; how these non- traditional benefits are evaluated is still a question. Need for utilities to come forward with these benefits; should there be standardization on how these benefits should be calculated across LDCs?
* The OPA makes some assumptions on carbon costs in its long-term planning work; may not necessarily be the right number, but can be considered as a starting point.
* LDCs have the burden of facilitation of the smart grid. They do get some quantifiable benefit, but a large number of benefits that are not seen by the LDC, but that society as a whole benefits from them (e.g., cleaner air, fewer people getting sick, not building the next peaker plant). Hard for the LDCs to say they were responsible for not building the next peaker plant. LDCs are stuck because they are the facilitator for SG, but may not actually be the facilitator because they can’t recover
* Smart Grid Forum Corporate Partners Committee created metrics on cost of SG itself and considered how you get benefits out of sunk cost. Metrics are reduced consumption, # of EVs, etc. Board may need to look in aggregate on how all LDCs are being measured
* Reason why Duke and Progress and claim responsibility for avoiding a peaker plant is because they are integrated utilities. Benefit of fibre-optic cable was derived by Facebook etc., not the folks that put in the fibre optic cable.
 |
| ***Group 2*** *(vendors and utilities)* | * Without defining what real time is, we recognize that there is high and low resolution data now for billing purposes; if anyone is going to make use of the high resolution data in real time – when it is most useful – collecting, storing it, etc. immediately negates real time benefits
* So real time implies data generated at the source; storage etc. should be a separate thing
* If data is going to be generated and used at source, is it necessarily appropriate for the industry to set a standard at every meter, or should we just leave it to the market to decide? Investigate costs of mandating upgrades for new capabilities vs. individuals investing alone
* 8 year cycle for meters. But the same meter does not? go back to the same client; so a meter will be recertified and go to 2 customers in its lifetime
* If there is to be a standard, should it be applied right now to everywhere, or only to future meters and phased in?
* Guidelines stated that utilities should be facilitating that access; the facilitation process should be setting the specification that the meter should be made accessible to 3rd party service providers. Don’t want to repeat what occurred with SM – put the specification frozen in time when it could have been evolving faster
* Environmental benefits are likely to be best achieved by measuring customer behavior and response to various signals. Need to keep thinking about metrics. Customers in general could be expected to respond to price signals, and price signals can be a proxy for environmental benefits.
* More tariff structures may allow people to respond to more rapidly changing events to give the signal on changing prices
* Current rate structure exists because of rate limitations in the past. We need the rate structures to reflect the ability to perform new capabilities.
* TOU is a proxy for market behavior. If there is an ability to signal a different set of prices to influence behavior, we may be able to do this with better technology for those willing and able to shift behavior based on their technology
* This would be moving to a dynamic TOU pricing structure, rather than just a red, green, yellow structure.
* not just for retailers, but LDCs as well. If a tariff structure could be created to give customers the choice - might be benefits to this. We weren’t thinking of the OEB approving a range of individual tariffs.
* Omission from the Minister’s Directive as it was translated to the staff paper, with respect to 4.1 Efficiency. Staff paper only talks about cost effectiveness of grid efficiency. Grid is just T&D, but not as wide as electricity system as a whole
* Yes, LDCs are commodity neutral, but RRFE speaks to whole bill mitigation. Incumbent upon Board guidelines or codes not to create things that reduce costs at distribution level that increase overall systems cost. Role for OEB, maybe not metrics, for providing system averages of various things that help customers reduce energy use
* Perhaps we have moved too quickly into discussing real time data; may be improvements still to be made in providing access to historical and billing data.
* Yes, real time data allows you to avoid costs in real time, but there is also amazing value in historical data when comparing load shapes and consumption levels on a year over year basis. This historical data can show if the operation of certain systems have degraded, etc.
* A multi-location customer, e.g., companies. Aggravating process to pull all the data together; would be helpful to pull all the data together.
* Did not come up with metrics to measure customer service.
 |
| ***Group 3*** *(vendors, utilities, a consumer group and an agency)* | * Green button is not real time; we agree that verification of information at MDMR may be the best bet rather than creating own MDMR
* Real time - jump from the meter, covers security and privacy, bandwidth issues don’t use the mesh networks
* If the fix on the meter is relatively simple (putting a collar, putting something on the glass, etc.) it doesn’t have to be a utility function, it could be the aggregator. To the extent that it must be enabled, utility has to be involved
* Does the meter need to be changed out? We felt that meter should be changed out on an as-needed basis rather than changing them all right now. Don’t see a need for full scale meter replacements
* Protocols will evolve; so a bit of risk that you are holding progress back if you create a standard. However, zigbee is the leader. The meter just provides the information, beyond the meter it’s up to the aggregator
* We provide the standard (the food tray), but not sure what the food tray is. BTM work is up to the aggregator / retailer
* Education; like gas industries, utilities provide baseline education and the actual specific education / marketing is provided by the service providers. The rate base increase is minimal; only a basic education on benefits is provided (e.g., installing this generic type of device could help you save 10%; the retailer etc. provides additional education on the device manufacturer)
* Similar to EBT and transaction set; beyond the supplemental report, the next step is to go through all the issues and keep going until it is done. Look at operational issues; utility owning the meter, you need to think about who pays for what, how does equipment get installed at meter (done by utility or by another party that LDC gives access to), or is a piece of equipment between meter and power, etc…lots of things need to be worked out.
* With regards to benefits and metrics, different proposition for LDCs. LDCs are commodity neutral, so what is the incentive for an LDC to do installation and therefore have an associated cost-benefit analysis associated with it? Instead of having a performance metric, it becomes more of an SLA
* Metric = meeting requests within a certain time frame, e.g., within 3 days
* LDC wants to recover any costs that were required to facilitate BTM activities
* E.g., EVs. LDC can offer an interruptible rate to charge EV or night. Or prepaid – prepaid customers use 15-20% less than folks around them that are not on prepaid. Not the job of utilities to measure this though, only in aggregate if it is part of CDM activities.
 |

***Operational Effectiveness and Network Evolution***

**Key observations from the discussion:**

1. The Board’s expectations for operational effectiveness and network evolution should avoid being too prescriptive.
2. Comparing results against LDCs’ past performance is preferable to (but should not necessarily replace) comparisons against performance of other LDCs.

**Discussion notes:**

|  |  |
| --- | --- |
| ***Group 1*** *(utilities, consumer groups, and agencies)* | * We said that in order to drive operational effectiveness and network evolution, a performance scorecard should be a major tool. Really important to get this correct. Another group is working on that within the OEB. A group like SGWG would be very helpful in coming up with a scorecard as well
* Scorecard should not be overly prescriptive in terms of metrics
* Should get focused on reacting to an outage as one of a scorecard metric; how quickly we can restore. Also how we can prevent the outage in the first place. Use this to determine what is best to improve reliability in the first place
* Had discussion on comparability of reliability between LDCs. Hard to compare different LDCs (with significantly different characterisitics). If we are being held accountable, we should be held accountable to making improvements within our own jurisdiction
* How to better utilize existing assets should be on the scorecard; but not sure what the metric should be
 |
| ***Group 2*** *(vendors and utilities)* | * Discussion on how to quantify costs and savings.
* Reliability standards are one thing, but the value of exceeding those standards is another
* Attention must be paid to metrics. Metric that works for one utility may not work to another because customer base may be different.
* Staff proposal is more prescriptive than other sections. Should the OEB decide on if interoperability standards should be met
* Many opportunities for projects between consumers and LDCs; you can have other people involved
* Would suggest proposal would be encouraging in how to make SGs in subdivisions; real benefits come from looking at a holistic basis rather than one off little technologies etc. Storage close to where it is used, etc.
* More of a smart energy network rather than just a smart electricity grid
 |
| ***Group 3*** *(vendors, utilities, a consumer group and an agency)* | * Very little to contribute beyond what is already on page. In agreement in principle.
* Operational effectiveness and evolution is within the purview of the LDC (SQIs etc.). whenever this goes beyond, it is difficult to go beyond (e.g., environmental investments)
* There is the proactive and reactive. We are reactive – you bring DG into our system, new assets, we react.
* does any LDC calculate lost revenue with outages?
* Whenever we wanted to move on reliability side from Q4, we have been told we don’t need to because customer density is so low and the lift is so heavy. We have been told when to move and when not to
* We have used this data when the mining sector was hot
* What about individual purchase of standby generators that doesn’t get into costs?
* Wouldn’t because it is BTM
* We are not convinced that putting smaller generators at a higher operating costs, unless it defers investment in T&D, poles and wires will always improve smaller generation. Putting storage on wheels because we think it will see 3 locations in its lifetime.
 |

***Innovation and Economic Development***

**Key observations from the discussion:**

1. Innovation and Economic Development are desirable, but novel, outcomes for the Board to evaluate proposed investments against. The Board must find the right balance between encouraging investments that are innovative and/or promote economic development but doing so without compromising core objectives such as efficiency and customer value.
2. It may be helpful if LDCs could pool resources to engage in innovation, this could lower risk for consumers as well as allow for greater participation among smaller and/or more risk averse LDCs in innovative projects.

**Discussion notes:**

|  |  |
| --- | --- |
| ***Utilities*** | * Is innovation something we can specifically measure, and is it something that should be measured above and beyond standard evaluations? Cost should not be sacrificed for the sake of innovation – 2nd bullet points to this
* Difficult to be innovative without putting customer cost at risk; difficult to balance. Not everything you try will be a success, some will be failures and who pays for these? Might be better to work with vendors and let them be the innovative ones, and maybe the LDCs are utilized as test beds, pilots, etc. but the risk and rewards lies with private sector
* Tough sell for this in today’s environment. In the past we were successful in innovation because we had integrated business. Sweitzers (sp?), GE benefited from our participation. The notion of being able to prove that every investment can be cost recovered is not feasible. To let the market run and then let us buy will always be tough for the smaller companies. Going to a risker model, we’ve used the variance account, but we don’t know where this is going
* There used to be R&D subcommittee, seems like a good perspective
* Have been approaching EDA. No collective strength in the EDA to mandate utilities to put 1% of revenue into a R&D pool. EDA utilities are at 0.37% innovation in R&D, vs. 0.7% in Quebec, vs. 1.0% in US. Nowhere near the 10% in the IBMs of the world
* from a financial perspective, you need to have the income and balance sheet to play with risk. Need a collective approach like we had in the past where one took the risk and we benefit in the past. We don’t compete, so why not share this
* Even though we leverage 13x our R&D pool and look to other utilities to share the risk; scale is too low ($4M every other year is too low). Who manages the pool of R&D funds? Maybe the EDA, or OCE…let the government decide
* I think about smart grid activities in two camps. Consumer smart grid; all the stuff we’ve been talking about to enable 3rd parties to introduce new products; and then there is the infrastructure smart grid. Infrastructure process may need to just go through normal capital and rate applications
* Efforts are not being duplicated already, e.g., Burlington Smart City, etc. when we apply for this work, we show that we are not duplicating work elsewhere.
* When we build out infrastructure within Waterloo region, we can together
* CDM is a little different
* Our $42M spend on diesel is being reduced because of our ability to ping smart meters. Our concept of smart grid involves efficiency etc. From business transformation perspective; we have change management occurring because we don’t think that current structure of organization will allow this
* Capital planning process has less risk than deferral accounts because we know we are going to get recovery
* If we were owned by an investor, would we do what we do? Might not take risks. You could run this like PG&E – unless it is in the rate base, don’t do it
* Innovation should inherently equate to something above normal risk. The risk band for recovery is unknown, when OEB will say no, when you will say yes. Need to know difference between equal and equitable. Have power to be equal, but in some cases, need to be equitable
* This is step 1. We know that this partnership is driven by a requirement, rather than a nice to have. So the investment will be well worth it. Need to then look at what the partnership looks like. HONI never takes IP technologies and spins off a new business, because it will not support the economic development of the province. Would welcome a large customer entity approaches us.
* We try to partner with as many people as we are able to. Don’t think we have ever been restrictive with the partners.
* Had a different point about how to do innovation. Yes there should be innovation. Answer is that neither deferral accounts or rate base is better. Neither of them are adaptable to innovation. Deferral account pushes a lot of risk to utility, allows for regulation with 20 20 hindsight, so utilities only put in something when we know it is going to work, so reduces innovation. The proposals for the new regime, propose a minimum 5 year business plan. I don’t think I could have told you 5 years ago what we’d be looking at this year or next year. Don’t think you can build innovation into a 5 year business plan – only going to include what you can predict today, always going to be behind
* Is there a way to overlay a more short term business cycle for things like SG over a pre-existing long term business plan for more established activities?
* I know what I want to do next year, but not the year beyond. How can I ask for things that are not really thought out in a 5 year plan?
* Encouraged by the fact that these things are still up for discussion. But as it is written now, doesn’t encourage me to invest in innovation under 5 year plans
* Difficult to regulate innovation. Hard to get agreement from a manager to agree to some new innovation that is not in the 5 year plan. Might happen to with large utilities
* Innovation might be different for different utilities. Trying to put structure in about what innovation might be. Innovation means the application of technologies or processes that give us efficiency. To us, it means an electronic control room, which other utilities have had for a while
* We are involved in a regional smart grid project with the Durham Region utilities. Are evaluation projects now. All 3 utilities are nervous now about rate recovery for doing the project. This is the pinch on the innovation
* Maybe we want to look at a cluster of the end usage. If we were to say this is an urban theme, how many urban utilities are participating in this? 3 or 4 elements to look at, how many people are investing and how many are involved. Is there are 5 year story and is there maneuverability?
* Think 4 or 5 years from now, the successful innovations will become the new form. We are struggling to get a model that is successful with the regulators. We don’t have a formula to ensure cost recovery and we are struggling with it
* Sharing of information is important. Those that have the privilege of being in an LDC and having more innovative activity, we see it as a part of our role to share it with our colleagues. Would be perfectly reasonable that if we came for a proposal for funding and it was approved for funding, that part of the requirement should be that we share these experiences
* Also wanted to talk about innovation and duplication issue. We would be innovative and a manufacturer had brought a new device. Equally if we see another LDC doing something and taking those ideas and applying them to THES. What is less straightforward relates to creation, dissemination of data (re: SG devices); the service is important; device is a means to an end. I may do my pilot to make sure back-end systems can manage service, not that the device does things. The difference between my LDC and others is the backend IT systems, so I might want to do a pilot to demonstrate system capability / operations before full scale deployment. May be duplication in technology, but pilot is to test application, not technology
* Think as much about data analytics on existing data as on new data
* In our ADS project, we compare notes with BC Hydro on Progress. BC Hydro is doing it for CDM, and we are doing it for management of renewables. Because LDCs do not compete with each other, we are good at collaborating and colluding for non-profit objective
* Importance of having guidelines about which investments would be recovered would be very helpful for small utilities. Small utility but amidst new economic development. Working with 36 subdivisions within our jurisdiction. How do we encourage the inclusion of community energy storage when these subdivisions are being built. Suggested creating a microgrid at new hospital being built. Guidelines on how to better measure economic development benefits
* Most of our net income goes to dividends to investors. Most of LDCs are on the REIT model
 |
| ***Technology Vendors*** | * Innovation and economic development; we are a small company and there is certainly no lack of participation for pilots / innovative projects with LDCs. The reality for companies coming up with innovations. Piloting does not give us volume we need to make it economically feasible, can’t keep doing pilot after pilot. If we’re going to expand into the global market, we need to share learnings between players so we don’t have to do same pilot over and over again. If a technology has been vetted, we can move to the next phase
* Options now are to put it in capital plans or deferral account
* How do take an innovation body that is at the whim of the political or fiscal body of the day and make it separate? Those funds come from the government or taxpayer or ratepayer. If you want long lasting innovation as opposed to fits and starts, maybe it does belong in the board as part of a prudency review as part of capital plans. Once an innovation is demonstrated, it can be used as the yard stick for what others should do.
* With deferral accounts it makes sense; with deferral accounts there is risk
* IRM etc. would ask how it is different for LDCs to make an application for something into the board for something innovative vs. the natural gas utilities. NG utilities have IRM, do all kinds of different projects that they want recovery on. Enbridge’s green energy initiatives; renewable natural gas hearing; they went out there and made an application to the Board; case stands on its own bearings. If there is a certain amount of leeway within IRM, and if it doesn’t pass sniff test within LDC, isn’t it a good thing that it isn’t going forward before going to the Board? Otherwise, do you let LDCs recover their costs for just bringing something forward to the Board for a new innovation for the betterment of all, even if it gets shot down?
* People are feeling innovation is being stifled because cost recovery won’t happen, but if there is a vetting process that OEB can put in place for at least putting the application forward for review, this may be a way to bridge the gap.
* Could you develop a TRC that is specific to SG initiatives to take into account some sort of risk threshold? Would provide the guidance for the LDCs and then the LDCs do their own internal testing before they come to the Board
* Perhaps risk needs to be defined as well. The reason that LDCs are risk averse and talk about incorporating a certain amount of risk that should be recoverable from ratepayers, need to consider that recovery is coming from ratepayers not some commercial entity. Commercial risk could be on commercial entity side with some shareable risk that is on rate base
 |
| ***Agencies*** | * Innovation was a big deal in the news a year ago; 15 CEOs had different definitions of innovation. Is it clear to the OEB what the minister means for innovation? Is it just technology and high tech stuff, or is it something more like business practices / new ways of thinking?
* We are talking about R&D here (in SGWG)
* A pre screen or approving capital plans etc. would be helpful. If we assume that there is risk in innovation, is there a possibility that a small portion of an LDCs together into region or by similar size etc. to have them spend that sum on innovation. With assumptions that some projects will work out and some won’t. This may facilitate innovation from a group perspective, would enable groups to do things
* There is a real challenge in ensuring that there is not duplication between LDCs, but at the same time, what might be innovative to one LDC may be old-hat to another. This will be a test to ensure there is not duplication.
* Sharing of information given risk of capital should be a mandatory component. Around projects, should be rigor around information gathering processes. How you document results of pilots / investments, how you share information, etc. should be looking outside of Ontario. Not having to redo pilots that have been done well in New York.
 |
| ***Consumer Groups*** | * 2nd point in proposed expectations in innovation; can this go further to say that utilities have looked into partnerships with other utilities, and that utilities look at not duplicating efforts for pilots and that they have information?
* Conservation fund. EDA used to have something called the ‘Tomorrow Fund’. What do best practices have to do with innovation?
* Directive covers two very different things: one is to maintain the pulse on innovations around the world. The other one is nest within planning and development, the ability to adapt to innovations, business models, etc…we are only talking about technologies, not innovation around productivity / processes etc. which may be a better focus. Maybe we need an innovation fund to include funding for productivity improvements, not just technology
* Yes, business models. There are inherent improvements that can come from SG and smart metering. Something as simple as customer shut off and reattachments, we can stop (LDCs disagreed with this point)
* Haven’t spoken about storage or microgrids. A utility I know is fighting its owner about building microgrids. The innovation of this utility has amazing implications for reducing cost, improving environmental benefits, etc. need to enable microgrids that cross utility borders. Should be some mechanism that encourages innovation. Needs to be a part of what LDCs live and breathe
* Not just distribution side of utility that should be funding innovative risks, it is the whole electrical system. Other things in terms of the directive is that we should be coming up with stuff that the fees based agencies should be changing, e.g., OPA should create an innovation fund
* Was suggested at energy storage conference that a customer group such as BOMA could partner with utilities and customers to make investment in storage. How would LDCs react to a customer pilot project? (Positive response received).
* Think the reservoir of good will is pretty empty right now based on past performance. I am hoping the Supplemental Report gives the LDCs something they can reference. The whole definition of a pilot is to learn and benefit from it, but if LDCs perceive risk and there is nothing they can refer to get risk, then they may be less encouraged to invest
* It is new for OEB to include economic development in analysis, but it is not new for the LDC system to think about this
* A utility and municipality are using a Conference Board model to generate the economic impacts of their community energy plan.
* Proposed expectations point; consider recent WTO decision
* There is a reason that world has latched onto SG. Competition for mfg. facilities worldwide. So if you are going to have metrics on economic growth and development worldwide, need to look at what is happening around the world. Really is a competition to say come to Ontario because we have the best uptime; need a global benchmark to measure economic development
* When GEA was passed, a lot of talk about economic development opportunities, specifically related to renewable energy. X deputy energy minister thought there was a lot more value from non renewable energy in SG benefits
* Very helpful to walk through concrete examples. To have some sort of forum for SG applications. One of challenges with OEB forum is rigidity of process.
 |

***Privacy and Cyber-security***

**Key observations from the discussion:**

1. When considering privacy and cyber-security, especially in the context of encouraging/enabling a competitive market for behind-the-meter services, it is important to aware of risks to privacy and security that may occur because certain market participants fall outside the regulatory framework.

**Discussion notes:**

|  |  |
| --- | --- |
| ***Utilities*** | * going to be a given if data is going to be transferred between parties. We have subscribed to PbD for some time
* As far as would want to see Board go would be to ask utilities to provide verification of proof of documentation to sign off that they have taken steps. In 2nd year working with 3rd party company to investigate meters. This year, we have added HAN in home devices to testing protocol and are requiring 3rd party and AMI vendor that devices work well with together. Doing this through a 3rd party security auditing firm. Demonstrating that we have gone to this length is all that we should have to do
* Maybe this concern is because data is going to be let loose. Is there an equivalent model as the CTRC for privacy that could be applied to electric industry? Would want to look at other industries like telco and banking before we go too far, such as putting PbD in the code
* View on cybersecurity is that it has been in place for some time. Question is how to recover, what is the damage, and how do you control the damage?
* Transmission side is very tight from cybersecurity / privacy. Challenge is around LDCs
* Need to have this discussion early. Once data gets out, nothing you can do with it. Data still gets out. Level of data we are talking about has privacy implications.
* Is utility free to use this data for distribution planning activities? Now I am using your data
* Do we want to start saying what is or is not private vs. not, and over prescribe?
* Compare security at small LDC vs. old utility I worked for that had larger security concerns. Graduated level or multi-level requirements might be more suitable (e.g., cottage country vs. very important political buildings)
 |
| ***Technology Vendors*** | * Important to have retailers that are licensed by the board. But there is a vast array of 3rd party service providers out there that are not licensed by the Board that are providing products / services related to SG. Not sure if the Board should go out there to license all organizations using customer data. This is why there is privacy built into laws that apply to all
* What is to stop Rogers from getting into home plugs, etc. extending their own services? Rogers is not licensed by the board, but still needs to abide by law etc.
* MPAC is very personalized, I can see exactly what my neighbour’s house is assessed at. How does MPAC get around this?
* A customer should be authorizing a 3rd party provider to gather data on their behalf. And you would have to sign an agreement authorizing your data to be used for other purposes. 2 ways to think about privacy. If the LDC is providing a standard mechanism to provide real time data, then there are 2 agreements. One between LDC and customer that says you are not going to let data slip anywhere it shouldn’t be going. And another between customer and 3rd party to ensure data is appropriately secured.
* do you need to treat residential vs. commercial? Could monitor consumer power consumption to impact financial markets
* Some data is more private than others. But personal data is personal data. Data itself belongs to customer, not LDC, government, etc. Everyone else is custodians of the data. Contractual obligations and governing laws dictate what you can do with it. groups will be on and offside with this
* This is why you have regulated utilities, because they are a natural monopoly. So yes, you should get access to this data for these purposes. But not for marketing
* Already have laws that dictate this. Don’t need to interfere with commercial relations on things we don’t regulate
 |
| ***Agencies*** | * OPA has discussed that for customer benchmarking, should ensure that data cannot be re-personalized. As more specific information about a neighbourhood is available, it could get re-personalized. So need to ensure that customer information is protected
* As a customer you should be able to approve who has access to your data. Would be a concern if people could use your data for marketing purposes; should be careful with respect to uses of 3rd party data provision.
* Customer / 3rd party agreement should not be regulated, but LDC / customer agreement could be
* OPA’s planning group and conversation group would like to have access to this data for planning purposes. Would the OPA, as a 3rd party, be able to get this data for these specific purposes? This type of question needs to be considered.
* IESO sees a gap in Ontario in terms what every player in sector’s role is for cybersecurity for understanding threats, sharing information etc. opportunity through this process for OEB to decide what role to play in the sector via license requirements, etc.
* Critical assets have a specific definition from NERC CIP. We need something more specific for SG
 |
| ***Consumer Groups*** | * What requirements are in the retailers’ license with respect to these issues? These should be looked at
* Customer data must be protected but not to the point to where the customer can’t get their data. Can’t make it impractical
* Original purpose of MDMR was to provide geographic data, with customer data masked out.
 |