

CSWG/NIST Smart Grid Privacy Subgroup

August 31, 2012

Attendance:

- Rebecca Herold – Lead
- Brandon Robinson – Southern Co.
- Amanda Stallings – PUCO
- Bruce McMillin – Univ of Missouri
- Dan Friedman - Amdocs
- Annan Sokker – FPL
- Andrew Clearwater – Future of Privacy Forum & Center for Law and Innovation at the University of Maine School of Law
- Christine Hertzog – SG Library
- Ward Pyles – Southern Company
- Rick Potter – Alliance
- Dan Francis – AEP
- Ken Wacks – GWAC
- Jules Polonetsky – Future of Privacy
- Katherine Compton – IPC
- Leonard Tillman – Balch & Bingham
- Brent Struthers - Neustar
- Lee Aber - OPower
- John Hudson – Centerpoint Energy
- Ruth Yodaiken – FTC
- Tim Schoechle – Univ of Colorado

Progress Reports:

5.3 - Legal Requirements – Amanda on behalf of Sarah – we have been meeting regularly to add necessary updates and remove antiquated references. There has been discussion over whether or not to include Golden Valley. We are working this through before submitting the final draft to RH. The anticipated date for submission is September 7.

5.4: CONSUMER-TO-UTILITY PRIVACY IMPACT ASSESSMENT: Rebecca is working on PIA with Tanya. Light updates needed. Finished by next week.

5.5 - Personal Info in the SG – Amanda – Working diligently on the draft and are almost completed with the final touches. Should have it to RH by Tuesday afternoon

5.6 - IN-DEPTH LOOK AT SMART GRID PRIVACY CONCERNS – Ward – Had a call yesterday. Two sections left to go through and should be good to go by next week.

Section (Old 5.6.5) 5.7: Smart Grid Data Access by Third Parties – Brent – We may be a little bit behind. Brent sent out a new draft this morning. The group is meeting on Tuesday to go through sections. Brent is hoping to have it done quickly.

Section (New) 5.8: PEV privacy issues – Rebecca - Have not been able to get in touch with Mike Coop. Just received a message from Coop stating he's ready to work on it again. The team is planning to meet next week to put the section together.

Section (New) 5.9: NSTIC issues – Amanda – We have been meeting regularly to go over the section. Working on final edits now. Should have the final draft to RH no later than September 4.

Section (New) 5.10: Awareness and Training – Rebecca - We're doing two different things right now. The first is writing a section for NISTIR 2.0. We are progressing with this pretty good. The second is creating the 3rd party training slides. The team is looking for someone from a 3rd party vendor to work on the first draft of the training slides for 3rd parties. If we don't find someone, Rebecca will work on it over the weekend. Lee Aber will look at his schedule and see if he can help out. Rebecca to contact Lee next week.

Section (Old 5.7): MITIGATING PRIVACY CONCERNS WITHIN THE SMART GRID (Privacy Use Cases) – Christine – The team is keeping good progress. About 90% complete on additional documentation needed to fully scope out the use cases. We're also including an examination of alternatives to show that there are other options to privacy disclosures. We're spending all the time on the use cases themselves. The team is going to final review based on some great feedback received to help make sure they are standardized and normalized with aligning terminology.

Rebecca reiterates the task at hand to update the NISTIR 7628. When teams are finished, she will put all sections together and the group will determine if any final changes are necessary. Then, we need to write the summary and the full set of recommendations as they are appearing throughout the sections. Hoping to simplify the work on this version compared to two years ago when we worked on the first version.

The Overview: New energy-related ISO standards.

Ken Wacks is the first to present his slides.

- ISO/IEC 15045-2: Information technology - Home Electronic System (HES) gateway - Part 2: Modularity and protocol
- ISO/IEC 15067-3: Information technology - Home Electronic System (HES) application model - Part 3: Model of a demand response energy management system for HES
- ISO/IEC 18012-2: Information technology - Home Electronic System - Guidelines for product interoperability - Part 2: Taxonomy and application interoperability model

See accompanying slides.

Tim Schoechle is next to present:

ISO/IEC 1544-8. Information technology — Business Operational View — Part 8: Identification of privacy protection requirements as external constraints on business transactions. (Freely available at: <http://standards.iso.org/ittf/PubliclyAvailableStandards/index.html>) Integrate regulatory and model frameworks for business transactions. Part 1: A person was not only defined from a legal perspective but from three sub-types as well: personal, private and government corporation. Their relationships are listed as Buyer, Seller, and Regulator.

Jurisdictional domains as external constraints: Jurisdictional domains are public policy requirements. The following are involved an individual in a business transactions:

1. Consumer protection – ISO called Consumer policy committee
2. Privacy requirements – dealt with in Part 8 of the standard
3. Individual Accessibility
 - What other standards were used?
 - 23 other ISO standards were used and an additional 12 international standards are in the bibliography. The document includes OECD guidelines for protection of privacy and APEC privacy framework among others.
 - There are common international law requirements of privacy protections in 11 privacy protection principles. This is Part 5. It was implemented by Annex and other reference materials.
 - What does ISO/IEC 1544-8 have that others don't?
 - It's an IT platform in neutral services for common legal requirements. Second, it's rule-based. The ISO/IEC provides a clear and conceptual framework model. They are basic standards for establishing privacy. Also has rules governing the identity of the individual. Addresses record retention, and focuses on the relativeness and aspects of personal info in business transactions. The standard does not address security or customer service standards.
 - This is a new standard just published earlier this year. Likely that the SG operators have already implemented many requirements of the standard addressing privacy protections and ID management. This should serve as a checklist for SG operators. Secondly, it provides a controlled vocabulary that can serve as a common basis for dialogue and understanding of SG privacy protections – both in private sectors as well as the regulatory community.

If you have questions regarding the presentation or would like more information, please contact Tim Schoechle at timothy@schoechle.org.

Ken states that US is obligated under WTO to use international standards unless there is a good reason not to. He also believes that we should be referencing these standards and stating where they may apply or may not apply. If we expect buy-in from others internationally to the NISTIR 7628, have to have a good reason for why their standards were not considered.

Rebecca: SG standards were not available when v1 of NISTIR 7628 was published. We are including mention of them in the next version.



Thank you for your hard work everyone!

Next Meeting will be **Friday, Sept 14 at 11:00am EDT**. Please continue working on your sections.