

# CSWG/NIST Smart Grid Privacy Subgroup

## February 10, 2012

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### Attendance:

- Rebecca Herold (Lead) – The Privacy Professor
  - Brent Struthers – Neustar
  - Tanya Brewer – NIST
  - Krystina Schaefer – PUCO
  - Amanda Stallings – PUCO
  - Chris Warner – PG&E
  - Steve Wright – Michigan PSC
  - Marianne Swanson – NIST
  - Dave Wollman – NIST
  - Chris Kotting – EIS Alliance
  - Mike Coop – Think Smartgrid
  - Mike Pavion – Commonwealth Edison
  - Tony Munoz - Colorado
  - Mike Kavanagh - Constellation
  - Becky Harrison – Progress Energy
  - Christine Hertzog – Smart Grid Library
  - Dan Francis - AEP
  - Ron Vader - DTE
  - Leonard Tillman – Balch & Bingham
  - Dan Friedman - Amdocs, Canada
  - Brandon Robinson – Balch & Bingham
  - Rick Potter – Alliant Energy
  - Jules Polonetsky – Future of Privacy
  - Steven Beale – Future of Privacy
  - Michele Drgon - DataProbit
  - Megan Hertzler – Xcel Energy
  - Aryeh Fishman – EEI
  - Anan Sokker – FPL
  - Chris Villarreal – California PUC
  - Ruth Yodaiken – FTC
  - Mary Ann Ralls – NRECA
  - Alex Churchill – Duke Energy
  - Ward Pyles – Southern Company
  - John Hudson – CenterPoint Energy
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- Anyck Turgeon
  - Jimmy Jackson – Progress Energy
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- Meeting since June 2009 – continuing to do work since NIST-IR 7628v2 came out. During these twice monthly meetings, we provide updates for what full groups and sub-teams are doing.
- PEV Team – Mike Coop – Welcome to the new people. Have not had a meeting in over a month. Chris and Mike got together to discuss Cali PUC new legislation regarding PEV usage and privacy. That was an aggressive effort going on towards the end of the year. When the report was issued towards the end of Dec, found that the burden was too costly for two few years. Still need to get guidance out there but the urgency has lessened. Hoping for a full group meeting in the near future to create guidelines other states can use – particularly SDOs can use.
- J2931/7 – an effort put together by SAE in response to feedback from SGIP cybersecurity workgroup. The feedback provided is that security has to be better as more vehicles plug into the grid. It's a very slow effort.
- Most car manufacturers know little to nothing about cybersecurity and how vehicles will affect the grid.
- Can contribute to SAE at no cost.
- IEC is moving forward on standards regarding renewables that look something like SAE standards.
- Please contact the group if you're interested in participating in this endeavor. Can also subscribe to the twiki.
  - Question: PG&E has comments they can probably contribute. Will speak offline with Mr. Coop.
- Training & Awareness Team – Rebecca Herold –
  - There is a need to help org's involved with the smart grid to know and understand the issues with smart grid privacy.
  - These are "train the trainer" slides. Gives the trainers ideas and suggestions for how to deliver training within
    - Created a slide-set for PUCs and Utilities. Currently working on the third version – consumers and customers.
    - These will be made available to any org's that have direct communication with customers and consumers.
      - Gives suggestions for topics to cover to get their own personnel prepared for consumer.

- Sub team meets every other Monday. Please contact Rebecca to join the group.
- These are NOT recommendations. Rather these are guidelines for others to use as tools for raising awareness of the issues to their organizations.
  - Can be modified to meet specific needs.
  - The slides are very specific to smart grid
- PG&E doesn't see the SG area doesn't differ that much from traditional metering infrastructure that has already gone through FIPS training and other best practices regarding data privacy.
- For more information, please visit: <http://collaborate.nist.gov/twiki-ssgrid/bin/view/SmartGrid/CSCTGPrivacy>
- NSTIC – Amanda Stallings/Tanya Brewer –
  - Deliverables come out in the last couple weeks.
  - Meeting held next Wednesday in DC for those interested in proposing pilot projects. This will be webcasted for those unable to attend.
  - There was an announcement that a governance recommendations document available at <http://www.nist.gov/nstic/>.
  - Suspecting that there will be a large public/private partnership in place to implement NSTIC and proposed projects.
  - We are watching to see if anyone from the electric sector proposes a project.
- Third Party Access Group – Brent Struthers –
  - Group met with Jonathan Booe at NAESB to determine the best way to move forward.
  - Brent – current plan to move forward. Best practices draft is out for review. We have gone through those individually. Branching out in two different directions: tried to remove all utilities language that applies to data from the utility to the meter. We are going to try to put that out to the group to go through and see if we can get that document out that handles data beyond the meter. Third party could be anyone from utility to Google. Will require a couple changes to terms in the best practices.
  - Second group will address gap analysis. Look at NAESB standards and provide analysis to NAESB that addresses differences in the two documents.
  - The standards subgroup is required to do a security review of all standards. Getting ready to do REQ 1. REQ 22 doesn't have much with regards to security but a lot with privacy. We are going to do a review and find the gaps and compare to NIST-IR v 2. Make recommendations for additions that will accompany standards from REQ 22. Send this back to NAESB for consideration
  - This group is limited because of documentation security.
  - Marianne Ralls from NRACA – clarification question: Standards subgroup will not look just at the security and standards components of REQ22 but also gaps with respect to privacy in REQ 22.
    - Our group will do privacy section, their group will do security.
    - Standards subgroup will map any security requirements in NIST-IR to requirements in REQ 22.

- PG&E needs clarification: to the extent of standards that are generally beyond the jurisdiction of utilities and utility Commissions. What's the role of this group to engage in standards settings between consumers and 3<sup>rd</sup> parties in market transactions? This effort goes beyond the meter – what is the role?
    - These are in no way, shape, or form standards. They are guidelines and/or best practices. This document will address concerns and items of interest that may be of concern to those with roles in smart grid and third party transactions.
  - We are not a representative of utilities. These are best practices regardless of what industry you're in. We did map to the FIPS and OAC privacy principles.
  - Under SGIP, they have authority under EISA to help facilitate standards – not make them. What they have been doing is reviewing standards to look for gaps in security. In privacy arena, have written guidelines that can be worked with if desired. This process is open and consensus-based.
    - Where is the line between interoperability standards and consumer commerce? Not quite sure that these principles need to go beyond interoperability.
      - EISA discusses secure interoperability standards. We can assume that securing privacy is a piece of that.
    - Are the right people represented to create a balance, whether it is consumer groups, third party groups, consumer protection agencies, etc.?
  - We have talked with a number of vendors. They are all very interested in what is being done. We plan to extend an invite to them to assist with this endeavor.
  - There is no plan to leap into general privacy. These projects are for smart grid-related privacy only.
  - There is still a concern of duplicating concerns, or “reinventing the wheel.”
  - Will gap analysis be made public?
    - Marianne advises yes, the recommendations will be made public.
  - NAESB REQ 21 and 22 are standards that are only released if payment is made; they are not available for general public dissemination.
  - Chris was told that states have access to NAESB standards, but copyright issues are still in play. If the states are going down a road without adopting a whole standard, that standard would have to be made public – that raises a copyright issue.
  - NAESB standards have been folded into Commission rules for a long time. Don't see how copyright has become an issue.
  - Group will receive clarification on this issue before the next meeting...
  - To join the group, please contact Brent Struthers at [brent.struthers@neustar.biz](mailto:brent.struthers@neustar.biz)
- It doesn't sound like anyone is opposed to the plan going forward. We plan to move forward with creating two different work products.
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- Privacy Use Cases – Christine Hertzog –

- We released 1<sup>st</sup> draft guidelines and applied those to 46 use cases. Created a tool for tracking edits line by line. ***Please use this document for edits.***
  - Encourage everyone to review the documents and provide comments/feedback.
  - We welcome everyone's feedback. There is no deadline for providing this feedback.
  - Please look over at least the first one or two use cases and provide feedback by the next meeting.
  - Unless tool is used, feedback will NOT be accepted.
  - Documents for feedback were provided in today's agenda.
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- Next Meeting will be: Friday, February 24, 2012