

1/13/12 – NIST Smart Grid Privacy Subgroup Meeting

In attendance:

Rebecca Herold
Tanya Brewer
Amanda Stallings
Christine Hertzog
Ruth Yodagen (sp)
Alan Zausner
Ward Pyles
Ed Goff

- Amanda will be taking minutes for the group
- The CSWG has a meeting on (some) Mondays to get updated on what all other CSWG subgroups are doing – about 10 other groups dealing with specific security information.
- Rebecca will be sending items related to all security since we have begun to incorporate matters of other groups into our group discussions.
- F2F will have everyone come together and get into details of 2nd version of NIST-IR 7628. Sterling VA at Neustar location. Have been creating a lot of good information. Will be thinking of how to package that into 2nd version and determine if there are additional items that should be included in this 2nd version. All groups are invited to attend. No costs will be reimbursed.
- Before the F2F, there will be a cyber workshop in Gaithersburg NIST offices. Tanya confirmed – it's a NIST's main campus. April 23-24. F2F will be 25-26.
 - If anyone wants to attend either meeting, please contact Tanya at NIST. There is a charge for the cyber physical workshop.
 - There is a call for abstracts at the NIST topics. Suggested topics should be submitted via abstract to NIST.
 - If your abstract is accepted, you will be compensated for registration fees. Travel is not included.
 - Registration fee = \$160 includes snacks and lunch.
 - Tanya will send info on these two meetings.
 - Tanya will resend information on how to send abstracts to NIST
- Team Updates:
 - Christine – Privacy Use Cases – groups sent docs to the NIST privacy group last week that cover the draft recommendations for use cases and how they relate to guidelines. The documents did include a tool for supplying comments. It is an in-depth document (over 500 lines). Please use the comment tool for any feedback. If not, your feedback will not be included in the document. Also, group will cover the entire amount of information on the call being held on January 27th. If anyone is interested in starting

review process now, please contact Christine ASAP for a walk-through of review process. Will gather all the feedback after deadline and will make changes as necessary. Final draft will be sent back out for review before it becomes part of final project. Document has 118 pages. Will go through every line of every page. Encouraging anyone that can help to do so. Tanya will send this to Francis Cleveland who helped to make original use cases. Will ask her to review, if possible.

- FYI – Rebecca also forwarded the message to NESCOR because they are interested in creating privacy use cases but did not want to duplicate efforts. They are interested in building more technical use cases but our using these for a basis.
- Mike Coop – PEV Team –
 - Tanya advised that Coop, Kotting, and Tanya got together for a writing session before Christmas 2011. Started putting together some thoughts as to what should go into PEV privacy. Tanya is trying to schedule additional time with these two. Whatever they write may get placed into a document created by Society of Motor Engineers. Looking for input from our group as to what they say regarding privacy. May be a section of next SEC standard.
- Amanda Stallings – NISTIC Team –
 - No Update.
 - Tanya states that NIST is working on recommendations as to what a governing body should like. Should be expected this document in the next 6 weeks. Once that is done, work will begin. Sometime in early March.
- Rebecca – Training & Awareness –
 - Continue to be active. Finished utilities and PUCs. These are “train the trainer” slides that help those training understand privacy implications of SG and what to use for possible training tools. We just started consumers as the next set. Anticipate that these will have a similar structure with a different audience.
 - We will give these slides to any entity that has a desire to communicate with consumers on issues regarding SG privacy and smart meter privacy. Amanda attended a NARUC meeting to present the slides. It is suspected that NARUC’s schools will use the slides to train new Commission and staff members.
- Brent – 3rd party Team –
 - Sent documents on December 23rd for review. Folks should have had a chance to review what was created. Largely based on what NAESB put out and California rules. Also incorporated ASAP-SG suggestions regarding security and privacy. Expanded on NAESB items because they also included things on data provided by consumers, not utilities per se. They will have a review beyond the small subgroup but not sure how that will be implemented.
 - The format is laid out in two documents. One document describes best practices while the other describes where the different sections came from. An Excel file has been created for comments.

- One question posed is where everything came from. The footnotes give references for information. A large part was transferred verbatim, but some things were changed to fit the needs of the group.
- Group went through different parties and included contractors and 3rd parties. Contractors and 3rd parties were separated as two different entities. Customer Energy Usage Data (CEUD) terms were used. Definitions came from NAESB document but were tweaked if they didn't cover something or read differently than desired. Did keep the break between what is a contracted agent and what is a 3rd party.
- Organization follows subject area. A matrix was created that separated Cali rules from NAESB and ASAP-SG information. Compared the different rows and created what team needed to say in the next column. Finally a column was created at the end to determine what the suggested final standard should look like. Some items have been expanded to fit all needs including customer energy usage data, data access, etc.
- FTC will have comments on the document in the near future.

- Question from Brent: can we give people more time? What kind of timeline is Rebecca looking for?
 - Next meeting is January 27 where we will plan to cover the 3rd party document to give everyone time to incorporate their comments. Comments due January 26. Document needs to be resent. Brent will resend the document to the team.
- Ruth: Question regarding definition of 3rd party. Washington Post had article on CS Convention (?). Discussed SG privacy. Their definition included 3rd parties and utilities. How do people really define 3rd parties? The background is really going to be those parties that have no business relationship?
 - The 3rd party has a business relationship with the customer. Team didn't really discuss business resources, but rather advised that the 3rd party is not a utility, regulatory authority, or energy provider (ISO). 3rd party never actually reacts with customers; it is only for an internal report that goes to regulatory authorities. They are doing work for the state or other regulatory authority.
 - There are really two sets for 3rd parties: the consumer engaged and those who never have contact with the customer. Some of these activities may involve back office work or if the state wants to look at energy usage in certain areas for ideas on how to help consumers save energy. Utilities will need to turn information to 3rd party who will in turn give a report to the state. Customer is unaware the entire time.

- Ed's experience is that this data is not detail interval data that this group is mostly concerned with. The interval usage data is not going to just be casually shared with any 3rd party or regulator that contains sensitive data. We will have to talk to Jason for clarification.
- The document sometimes treating the consumer like a 3rd party. Especially those using a smart appliance and wanting usage data for the purposes of efficiently operating the appliance. The consumer is uploading that data into their device. Data collected directly from consumer is sometimes 3rd party but there are also consumers trying to access utility's data for their specific account – not 3rd party, it's the 1st in this case. If the data is going directly to the consumer, everything is fine. Otherwise, the parties involved will need to follow guidelines.
- At least one 3rd party between the utility and the consumer that requires a different level of rigor than the average consumer requesting information directly from their utility.
- Who is the initial custodian? Ruth believes that this is something for more discussion later on. Different people have different ways of using 3rd parties. California dealt with this by defining primary and secondary purposes. Must describe the relationship with the consumer. The utility is the main party. Other entities whether they receive direct information from the appliance or the utility itself are usually considered 3rd parties for purposes of this document. The FTC tends to use the word 3rd party differently – basically an entity that removed by one step from the consumer. Many people use the terminology differently. There is a difference of opinion already.
 - Tanya's scenario – no 3rd party involved if consumer logged into utility's website and downloaded a file containing energy file. If I am downloading a file and can use a web browser to view it as a pdf or Word file, there is no 3rd file involved. If however, I am using software or tool to help me understand it (like OPOWER tool or Facebook app), there is an entity behind the software that is considered a 3rd party.
 - From utility POV, there may be a certification required to understand who the person is running the program but it doesn't matter where that data is being viewed from whether it be a computer or Smart TV. Financial institution said log in and we'll show you your

information. Initially, it was horrible because bank had to verify it was a legit app but it all worked out in the end.

- If I have directly downloaded it from an FTP server, and it is my ISP talking to utility ISP without passing through another tool, there is no other 3rd party involved. But if I'm using Facebook app to get the data, it's passing through something else and that's a 3rd party.
 - There is no legal difference between what tool I'm using to view the information.
- Good to add description of 3rd party flowchart describing what types of 3rd parties may be involved. Privacy involves access control and who is able to view the data. This is something we need to consider regardless of what legal implications there are defining who is viewing the data or what apps are used.
 - Group will create a tool depicting a graphic that defines a 3rd party for the purposes of the 3rd party data access group.
 - Brent will discuss that in the next group meeting. Tanya and Brent will work on creating diagrams.
- Audit section on page 8 may be a little controversial.
- Ruth – if there are specific items that there is a question, should we send those questions to Rebecca?
 - Rebecca: Please send specific questions to Brent and Tanya.
- Miscellaneous – there was an article sent by Tanya that is representative of what we see more of in the privacy industry. Having energy monitoring systems that customers can use through their iPhones or iPads. Will be an additional component of having energy usage data either being passed through or shared with other parties.
- FYI – January 28th is International Privacy Day. Rebecca has had Iowa proclaim January 28th as International Privacy Day for the last three years. They have done it again this year. Current governor signed the proclamation. Please consider asking your state's government to recognize January 28th as Privacy Day. For more information, please see the agenda.
- San Francisco Churchill Club is hosting privacy event that will have presentations from multiple parties including Microsoft.
- Washington DC is also hosting a privacy event. Topics will not include privacy information for smart grid.
- **Next meeting will be Friday, January 27th.** Please review at least one document for comments and/or suggestions for improvement. Use the spreadsheets for feedback.

- If you know someone that would be a good speaker for our meeting, please send Rebecca and/or Tanya a note so they can make arrangements on the agenda.
- After the NAC (?) documents come out, it may be a good idea to have someone from the FTC present this new information. Ruth will make arrangements for someone to speak on this subject once the final document comes out. Timing is not set in stone, perhaps sometime before April but not 100 percent accurate. Will keep the group up-to-date on any changes or follow-ups.

Meeting Adjourned