



PUBLIC INTEREST ADVOCACY CENTRE
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February 25, 2018

VIA E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
Toronto, ON

Dear Ms. Walli:

**Re: EB-2018-0316 Smart Metering Entity - Fees for access to data by third parties
Interrogatories of the Vulnerable Energy Consumers Coalition (VECC)**

Please find attached the interrogatories of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Yours truly,

A handwritten signature in black ink, appearing to read 'M Garner', is written in a cursive style.

Mark Garner
Consultants for VECC/PIAC

Ms. Miriam Heinz, Advisor Regulatory Affairs, IESO
regulatoryaffairs@ieso.ca

For interrogatory clarifications please contact Mark Garner at 647-408-4501 or markgarner@rogers.com

REQUESTOR NAME

VECC

TO:

**Smart Meter Entity-IESO TPA
Application**

DATE:

February 25, 2019

CASE NO:

EB-2018-0316

APPLICATION NAME

Third Party Access Application

1. Is the SME's proposal that access should be provided at market prices appropriate?

1.1 Reference A/T1/S1/pg.3 & B/T3/S1

Please describe the mechanism by which the SME proposes to determine "market price" for the offered data?

Reference A/T1/S1

Please explain what a "principled assessment of each request to the data" entails.

1.2 Reference B/T1/S1, pg.3

a) Please provide the form of the Data Use Agreement (DUA) reflecting the contractual terms identified at B/T1/S1/. If such a form of contract is not available please explain what form of contract will be presented to prospective third parties seeking purchase of data.

b) Specifically identify any terms related to re-sale rights.

1.3 Reference B/T2/S1

Does the SME's intend to make available publicly the names of parties purchasing data from the SME? If not please explain why not.

1.4 Reference B/T2/S1

Please provide and describe (give example of) the different data sets that might be offered under the three types of offering described at Exhibit b (i.e. Public Offerings, Standard Private Offerings and Custom Offerings).

1.5 Reference B/T1/S1/pg.4

Please identify the members of the “Ethics Review Committee”. If the committee has not yet been struck please identify the institutions or interest groups from which the SME proposes to nominate members.

1.6 Reference B/T2/S1

Please provide the summary reports of the DSAC pilot described at the above reference.

2. Is the SME’s proposal that access should only be provided to any person who meets the criteria for access established by the SME and enters into a Data Use Agreement with the SME appropriate?

2.1 Reference: A/T3/S1

Please provide the recent Third Party Access Implementation Plan.

3. Is the SME’s licence amendment proposal appropriate?

3.1 Reference: B/T6/S1

Is the SME seeking to amend its licence to have the Board forebear both from setting the rates (fees) and the terms and conditions for the TPA services?

3.2 Reference: B/T6/S1

What other parties provide access to customer electricity metering data that would underpin the competitive market-based model postulated by the SME/IESO?

4. Are the IESO/SME’s proposals and methodology for calculating net revenues generated by third party access and the proposed allocations of those revenues to Smart Metering Entity Charge rate payers appropriate?

5. Is the SME's proposal to create a new variance account, the Benefits Account, to track the net revenues generated by third party access appropriate?

5.1 Reference B/T4/S1

What interest rate do balances in the proposed TPA Benefits Sub-Accounts attract?

6. Is the SME's proposal to have the proposed Benefits Account be a sub-account of the Balancing Variance Account appropriate?

6.1 Reference B/T4/S1

Please provide a copy of a typical SME/LDC agreement as referred to at Exhibit B, Tab 4, Schedule 1, page 1 line 11-13.

7. Is the SME's proposal to annually report on the net revenues generated and tracked in the Benefits Account in the annual report filed with the OEB by May 31st appropriate?

8. Were the stakeholder engagement efforts undertaken by the SME regarding third party access to data at market prices sufficient?

Reference: A/T3

8.1 a) What form of notification was provided to Ontario residential and low-volume consumers of the SME's intent to sell their data?

b) Have ratepayers provided positive affirmation for their data to be sold to a third party? If not please explain why this is not required.

Reference: A/T3/S1/pg. 1 & B-5-1 Attachment 3

8.2 Please identify the residential and small volume consumer representatives on the: -Data Strategy Advisory Council ("DSCA"); -SME Steering Committee ("SSC"); and, -IESO Stakeholder Advisory Committee ("SAC").

8.3 Please explain to whom the Third Party Access Implementation Plan was circulated and provide the comments (or summary of) from these participants.

9. In the event revenues from the Third Party Access program are less than the cost of developing and operating that program, what entity would be responsible for such deficit?

9.1 Reference: B/T2/S1 & B/T3/S1

a) What are the 2019 and 2020 forecast costs of developing and implementing the SME data retail function?

b) Please provide the number of FTE's allocated to the TPA function in 2018, 2019 and 2020

c) Please provide the forecast consulting costs for the data access project for 2018, 2019 and 2020

d) What is the current cost incurred for the TPA/data access project?

9.2 Reference: B/T2/S1 & B/T3/S1

Please explain how costs for the free public offerings of data are proposed to be recovered.

10. What steps has the IESO/SME taken to ensure that the data is sufficiently protected and to prevent its re-identification, and are those steps sufficient? What conditions, if any, should be included in the SME's licence to ensure privacy protection in respect of the data?

10.1 Reference B/T1/S1/pg.2

a) Please provide a list of all data fields which are proposed to be included in data offered for sale.

b) Please explain how any data fields with personal information are to be non-personalized to assure customer anonymity.

10.2 Reference B/T1/S1/

Please provide the "De-identification Guidelines for Structured Data" referred to in the footnote on page 1 of Exhibit B, Tab 1, Schedule 1.

10.3 Please confirm (or correct) that data related to Toronto Hydro-Electric System customers is not be part of the data sets offered for sale.

11. What are the overall objectives of the IESO/SME regarding its proposals to provide data to third parties at market prices? How will the OEB determine whether these objectives have been met?

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