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BY EMAIL

Ms. Kirsten Walli
Ontario Energy Board
Suite 2700, 2300 Yonge Street
P.O. Box 2319
Toronto, ON, M4P 1E4

Dear Ms. Walli:

EB-2018-0316 – Smart Meter Entity Fees for Access to Data by Third Parties

On January 10, 2019, a letter of Direction and Notice (the “Notice”) from the Ontario Energy Board (the “Board”) was issued requesting interested parties to comment on the application made by the Independent Electricity System Operator (“IESO”), in its capacity as the Smart Metering Entity (“SME”), to amend its license to be able to charge market prices for access to non-personal data in the Meter Data Management Repository (“MDM/R”) by third parties. A draft issues list was included by the SME, along with the Notice, the Application and other supporting materials, to address the key issues of relevance.

In general, Hydro One Networks Inc. (“Hydro One”) does not have any issues with the SME’s proposal to charge market prices data based on the pricing model outlined, the terms and conditions upon which third party data access will be granted, the data products that the SME will offer or the proposed process for tracking and disposing the net revenues generated from the service of providing access to the data. That notwithstanding, Hydro One would like to provide the following comments on the SME’s plan to provide third party access to the MDM/R data.

Customer Outreach Plan – Education and Awareness

While the SME has undertaken to ensure that access to only de-identified information is provided to third parties and established appropriate terms of access for the use of this information, the SME has not indicated how it intends to broadly communicate its plan for providing third party access to the MDM/R data with electricity consumers. The SME should not overlook the fact that electricity consumers have become increasingly more protective of their personal information and the data that is being recorded by their smart meters. To avoid potential backlash and further privacy concerns from customers, the SME should be requested by the Board to include a customer outreach strategy as part of its overall implementation plan to provide third party access to the MDM/R data. The strategy should explain to electricity consumers how their personal information will be protected under the proposed terms of access

principles and how providing third party access to the MDM/R data will also reduce the SME cost to customers. Hydro One believes that the IESO, in its capacity as the SME, should make available any materials related to the customer outreach strategy on its website.

Customer Strategy Plan for Responding to Complaints

In its application, the SME has also not provided any information or details as to how it plans to address customer complaints received regarding third party access to meter data. As mentioned on page 4 of Exhibit B, Tab 1, Schedule 1, the terms of access principles and provisions of the data use agreements entered into with third parties may not sufficiently “protect against the disclosure of attributes relating to groups of individuals that may lead to non-ethical uses of data.”

Hydro One’s main concern is that data obtained by third parties could be published in such a way that could inadvertently lead to “energy shaming” of a particular community or customer rate class. In one recent example, data was provided to a third party as part of a pilot project and they were able to clearly map out older subdivisions that were using more electricity than newer, more energy sufficient subdivisions. They were also able to map out where energy consumption was higher in richer communities that include larger homes. Hydro One received several complaints from customers who were affected by this situation. In general, there has been a tendency for Hydro One to receive complaints from customers in relation to social benchmarking studies that rely on energy usage data.

Given the strong likelihood of receiving customer complaints in regard to providing third party data access, the SME should be requested by the Board to develop a customer strategy plan for responding to complaints as part of its overall implementation plan to provide third party access to the MDM/R data. The plan should include a contact number for customers to make a complaint, the assignment of appropriate resources to handle customer complaints and agent scripting for distributors who receive complaints from their customers. Additionally, the SME’s costs for providing third party data access should include the costs associated with implementing its customer strategy plan. Hydro One believes that the responsibility for dealing with any customer service issues that may result from providing third party data access should rest with the SME and that distributors should not have to bear the cost or responsibility of handling these customer complaints.

Hydro One would be happy to review and provide stakeholdering support on the SME’s customer outreach and customer strategy plans.

Sincerely,

ORIGINAL SIGNED BY JEFFREY SMITH

Jeffrey Smith