

Chapter 3 – Data privacy

Question 1: Do you have any comments on our overall approach to data privacy?

Overall the paper is pretty comprehensive and at this early stage it covers the points it needs to.

A thorough review though will need to be carried out at the detailed design stage. The need to "build in security" at the start is an important one for the 3rd party companies who will eventually tender for the systems build work.

The detailed design needs to ensure that:

- (a) all of the data (both stored and in transmission) is secured against the risks associated with tampering, eavesdropping, unauthorised use, backup and recovery.
- (b) the smart metering system does not provide unsecured access points which could be used to compromise the network/systems.
- (c) there is some level of security penetration testing of the system being built into the development and ongoing support of the smart metering system.

We note that section 2.10 of the consultation document assumes that data flows VIA the DCC. In a smart grid role, it is possible that data (eg voltage) may need to be bled off en-route to DCC.

It should be noted that network operators already have rights under MOCOPA and standard connection agreements to install "operational metering equipment" necessary for network purposes. Network operators would need rights to access data streams, down to near real time in respect of voltages. It is not clear whether control signals constitute "data" – eg DSM or voltage control actions.

Question 2: We seek views from stakeholders on what level of data aggregation and frequency of access to smart metering data is necessary in order for industry to fulfil regulated duties.

No comment.

Question 3: Do you support the proposal to develop a privacy charter?

No comment.

Question 4: What issues should be covered in a privacy charter?

No comment.

Chapter 4 – Smart metering system security

Question 5: Do you agree with our approach for ensuring the end-to-end smart metering system is appropriately secure?

No comment.