Smart Meter Data Privacy Plan

Version 1.6

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Contents

OVERVIEW

This document has been drafted to fulfil our requirement under Standard Condition 10A.4a of our Distribution Licence. We have structured the majority of this document to meet Ofgem's expected content as outlined in the Ofgem September 2016 open letter 'Overall criteria for the assessment of Distribution Network Operators' data privacy plans for access to household electricity smart metering data'.

By the end of 2020, the aspiration is that approximately 53 million smart meters will have been installed in over 30 million domestic and commercial premises across Scotland, England and Wales. This programme is already underway, however the meters installed to date are largely SMETS1 which cannot currently be accessed by the DNO. However, SP Energy Networks (SPEN) expect to be able to communicate with the majority of smart meters in the long term.

SPEN own and operate networks in two licence areas: SP Distribution (SPD) covering the south of Scotland; and SP Manweb (SPM) covering North Wales, Cheshire and Merseyside. Each area is a mix of rural and urban landscapes with approximately 1.9m domestic customers in SPD and 1.4m domestic customers in SPM.

As set out in our ED1 business plan, we anticipate being able to provide improvement in the operation of our networks and the service we provide to our customers via the use of smart meter data.

With access to more granular information on energy consumption we believe we will be able to optimise the use of our assets. This will help us to deliver faster and cheaper connections for businesses, consumers and generators alike and help to defer or avoid the need for costly traditional reinforcement of the wider network.

In the short term, we believe the use of smart meter Half Hourly consumption data would be beneficial in the areas of:

- Increased visibility of the LV network:
  - Facilitating the move from DNO to DSO, as smart meters will provide feedback on local balancing actions
  - Better understanding of the impact of LCTs connecting to the network and the challenges in managing increased loading on localised sections of the LV network
  - Better understanding of the impact of dynamic control devices in the LV network
- Improved connections:

  - Improving the calculation to assess the location and requirements for new connections in the LV network
- Losses analysis:
  - Determining locations and causes of losses in the LV network, hence reducing costs to SPEN and our customers

1. OFGEM CRITERIA 1: THE DATA AND SPECIFIC PURPOSES

Explain clearly what electricity consumption data will be accessed, in what format, over what period of time, from which consumers, and for which specific purposes. Those purposes must be relevant to the regulatory requirement to develop and maintain efficient, co-ordinated and economical systems for the distribution of electricity.

Data to be accessed

As defined in our Distribution Licence (SLC 10A.13) Electricity Consumption Data means, *'in respect of a relevant premises, the quantity of electricity measured by the Electricity Meter as having been supplied to the relevant premises'.* For the purposes of this plan we therefore define Electricity Consumption Data to be both:

- Active Import (AI) HH readings
- Reactive Import (RI) HH readings

We believe that both of the above would be considered personal information as defined within the Data Protection Act 2018, but are not considered sensitive personal information.

Other data available from smart meters is not considered in the scope of this plan, although all data will be considered under our wider GDPR obligations.

In what format

As per SmartDCC interface capabilities, disaggregated Electricity Consumption Data will be collected via the SmartDCC as Half Hourly (HH) interval readings from each smart meter. This data will be stored on SPEN's secure servers, aggregated to feeder level and the aggregated value retained as detailed within Appendix 3. Hence, this data will not be used in a disaggregated form but will be processed and accessed as described in Appendix 3.

Over what period of time

SPEN will schedule routine collection of Electricity Consumption AI and RI data from the Smart Meters on a rolling monthly basis via the SmartDCC. The aggregated form of this data will be retained for the default SPEN data retention period of price control period + 2 years. This is a business wide retention period defined to allow us to accurately report during our price control period and respond to any subsequent queries effectively for a set period of time after the price control ends.

From which consumers

When a SmartDCC enrolled smart meter is installed by a Supplier at a premise, SPEN's meter management system will automatically schedule routine collection of disaggregated Consumption Data from that Smart Meter on a monthly basis via the SmartDCC infrastructure. The disaggregated Consumption Data received by SPEN will be used to generate:

- Total monthly consumption in respect of each meter
- Monthly maximum and minimum demand for each meter
- Aggregated monthly HH profile data in respect of the Feeder to which the customer is connected

SPEN will only collect data from customers who have a Smart DCC enrolled meter.

SPEN have chosen to collect data on a monthly basis as:

- the message sizes will be smaller allowing a shorter window for transfer and processing; and,
- more recent data will be available for analysis that may help avoid faults or constraints in the network caused by increased loading.

Specific Purposes for the data

Electricity grids across the country are undergoing a rapid transition. The UK is already seeing the impacts of the transition to a low carbon economy; our electricity generation mix is changing with an increasing level of renewable and other low carbon generation. At distribution system level, the increasing requests for connection of solar PV installations, onshore wind farms, and other forms of distributed generation are creating technical challenges. As customers see the economic value in the adoption of distributed energy resources (DER), which provide people with a choice in their energy source and the ability to proactively manage their energy use, the trend in distribution network transformation will continue at apace.

Alongside a generational shift in our supply, demand for electricity is also likely to change as new parts of our economy start to electrify such as heat and transport. Heat pumps and electric vehicles have the potential to deliver significant carbon reductions but will significantly increase demand on the electricity network.

Flexibility is increasingly central to this transforming system and DNOs are becoming Distribution System Operators (DSOs) where they are more active managers of their networks, implementing innovative solutions as alternatives to network reinforcement.

Most of the potential for storage and demand flexibility will be embedded in local networks. With access to improved availability and more granularity of information on energy use, options for balancing supply locally (e.g. Demand Side Response and storage) complemented by new commercial arrangements with flexible service providers, DSOs will be able to take steps to optimise reinforcement and use of the network to free up existing capacity and make better use of existing assets. This can help deliver faster and cheaper connections for businesses, consumers and generators alike and will help to defer or avoid the need for costly traditional reinforcement of the wider network.

Specifically, SPEN believe the use of smart meter Half Hourly (HH) consumption data will assist us in our duty to develop and maintain efficient, co-ordinated and economical systems for the distribution of electricity. To this end, we have identified several specific purposes for the data as summarised below:

Increased visibility of the LV network: Facilitating the move from DNO to DSO, as smart meters will provide feedback on local balancing actions which will result in :

- Better understanding of the impact of LCTs connecting to the network and the challenges in managing increased loading on localised sections of the LV network.
- Better understanding of the impact of dynamic control devices in the LV network.

To help predict the occurrence of constraints on the LV network the modelling tool (LV aggregation system) will be used to run scenarios of potential loading cycles to see when constraints may occur and what action (curtailment, reinforcement, reconfiguration) may need to be taken.

In addition, machine learning analytics will be applied to the LV model to determine if the connectivity of the LV model is correct given the known power quality and loading measurements from smart meters. This will help identify if a customer service termination point is associated with the wrong substation or feeder.

An overview of our LV aggregation system user profiles and interactions is provided in Appendix 2.

Improved connections: Improving the calculation to assess the location and requirements for new connections in the LV network.

SPEN have an existing connections process which requires manual design based on loading assumptions. In the LV area, it is anticipated these designs will use actual smart meter profile data for the feeder rather than assumed data.

Losses analysis: Determining locations and causes of losses in the LV network, hence reducing costs to SPEN and our customers in these areas.

The LV aggregation system will be used to identify where losses may have occurred in the system, either technical, potentially due to overloading in the system, or non-technical where theft or misuse may be an issue. We intend to develop our LV analysis model to determine the location and size of losses as set out in our Tranche 2 Losses Discretionary Reward submission. This will result in benefits to both SPEN and customers as networks operate more efficiently, particularly under any additional stresses introduced by LCT technology. Consumption data will be a key aspect in losses evaluation.

Summary of legal basis for processing consumption data

As set out in detail Schedule 2 to Annex 1 of this plan we have analysed our legal obligations and legitimate interest for using consumption data.

In summary, GDPR allows organisations to process personal data where doing so is necessary to comply with a legal obligation. We believe section 9 of the Electricity Act 1989 (efficient network operation) and condition 52 of the Electricity Distribution Standard Licence Conditions (facilitating competition) provides this legal basis.

Where consumption data processing is not required to comply with a legal obligation we have identified some legitimate interests as set out in Criteria 1.

2. OFGEM CRITERIA 2: USE OF CONSUMPTION DATA

Explain how smart metering data favourably compare to traditional electricity consumption data in terms of feasibility, cost effectiveness and efficiency in achieving the purposes described in our first criterion, and provide any supporting quantification of the benefits that could be delivered for different groups through access to this data (e.g. network benefits, consumer benefits, future development of smart grids etc.).

Feasibility

Currently, SPEN receive a total of annual consumption from suppliers for each customer premises. Hence, there is no visibility of peaks and lulls in demand over the course of days and seasons.

Consequently, maximum demand loading in substations and feeder is estimated, often with a rule of thumb such as After Diversity Maximum Demand **("ADMD").** ADMD is a conservative assumed maximum demand for the Customer at the time of the highest demand on the substation or LV circuit.

These relatively static and historic assumptions will struggle to take account of the dynamic nature of demand in a Low Carbon Technology environment. Smart meter data is an actual measurement of behaviour and can point out the changing nature of maximum demand in this dynamic environment.

Therefore, where smart meter data is available it makes this level of analysis feasible, whereas traditional methods do not.

Cost Effectiveness

Deploying traditional LV monitoring at each customer premise would be prohibitively expensive for a DNO, likely to require tens of millions of pounds in investment. Given the smart meter deployment is a national initiative we are assessing the use of smart meters as LV monitors where the operational costs justify the benefits.

In our RIIO-ED1 Business Plan, SPEN estimated that improved knowledge of actual network loading will lead to an eventual 5% reduction in load and connection related reinforcement.

Although we expect benefits to be considerably reduced due to the delays in the smart metering programme, the ED1 predicted benefits are shown in the following table. It is unlikely that all of these benefits will be impacted by the use of consumption data.

Avoided Costs Description	Type	ED1 (£m)
Better informed Load Related investment decisions	Planning	1.8
Avoided voltage complaints	Operations	0.7
Reduced investment to serve new connections	Planning	1.5
Reduction in operational costs to fix faults	Outage Management	2.8
Reduction in calls to faults and emergencies lines	Outage Management	0
Reduced guaranteed standard failure payments	Outage Management	0.2
Active network management	Planning	1.7

Table 1. Predicted benefits from ED1 with smart metering consumption data

Efficiency

As smart meter data can be automatically collected securely via the SmartDCC and aggregated in our systems this provides an efficient mechanism to monitor the network. This is in contrast to traditional monitoring which, at secondary substation level, can be a highly manual process.

Benefits

This LV aggregation model, used to aggregate Consumption Data to feeder level, will use this information in subsequent scenario modelling and management activities. This will provide benefits for DNOs which could not be realised using traditional data.

Network Benefits:

- Increased visibility of the LV network.
  - Facilitating the move from DNO to DSO, as smart meters will provide feedback on local balancing actions
  - Better understanding of the impact of LCTs connecting to the network and the challenges in managing increased loading on localised sections of the LV network
  - Better understanding of the impact of dynamic control devices in the LV network

  - This is related to all the avoided costs mentioned in Table 1
- Improved connections
  - Improving the calculation to assess the location and requirements for new connections in the LV network, therefore customers experience more cost-effective connection fees and quicker connections
  - This is related to avoided costs in Improvements to serve new connections and Load Related Investment decisions
- Losses analysis
  - Reducing technical and non-technical losses leading to more efficient operation of the network
  - This is related to avoided costs in Load Related Investment decisions

Consumer benefits:

- Enabling quick and efficient connection of LCT to SPEN's network
- Potential overall reduction in DUoS charges for customers

Future applications

SPEN expect to use the LV network models, annotated with aggregated consumption data at feeder head as described in Appendix 2, to enable multiple innovation activities. Some key innovations are outlined here:

- EV scenario modelling: using granular LV data to accurately model the impact of EV charging points.
- LV scenario modelling: in addition to EV scenario modelling, look at the combined effect of Distributed Energy Resources (DER), automation and fault analysis.
- NIC LV Engine project (solid state transformers/DC supply for street lighting/LV charging): using granular LV information to create a feedback loop to assess the impact of LV transformer changes.

3. OFGEM CRITERIA 3 - COMMERCIAL USE OF DATA

Provide assurance that any commercial use of the data by the DNO or third parties is excluded from these purposes, both before and after the data anonymisation.

Commercial use of data

Our Distribution Standard Licence Conditions 10A.9 and 10A.10 prohibits us from using Consumption Data (or data derived from Consumption Data) for reasons other than those set out in our licence. The controls outlined in the Privacy Impact Assessment will help protect against potential misuse of the data for commercial purposes. We have disseminated a privacy notice to our customers so they know how their data is being used.

Contractual arrangements with third parties

We will not sell consumption data to third parties. In order to fulfil our licence obligations to run an economic and efficient network, we may need to share Consumption Data with third parties in limited circumstances, for example:

- Sub-contractors employed by SPEN to carry out network modelling; and
- Independent Connection Providers who request access to Consumption Data relating to a specified SPEN feeder in order to design a connection, under circumstances where SPEN policy specifies that this is an essential input i.e. that the ICP is unable to design the connection to meet SPEN's published policy requirements without this data.

In sharing any aggregated Consumption Data with third parties, SPEN will agree contractual obligations setting out the proposed use of and subsequent destruction of Consumption Data. The consumption data provided will be aggregated to Feeder level i.e. the same data that is used within SPEN for design purposes.

This data would be shared as an extract from our network model, aggregated as set out in Appendix 2, and would not contain MPAN information. Therefore, the parties listed above would have no means to specifically re-attribute consumption back to individual customers from the information supplied by SPEN.

4. OFGEM CRITERIA 4 - CONSUMPTION DATA LIFE CYCLE

Explain clearly how, where, when and by whom collation, maintenance, use and deletion of the data would take place securely and cost-effectively (these steps form what is referred to as 'Electricity Consumption Data life cycle' in the ENA's Generic Privacy Framework).

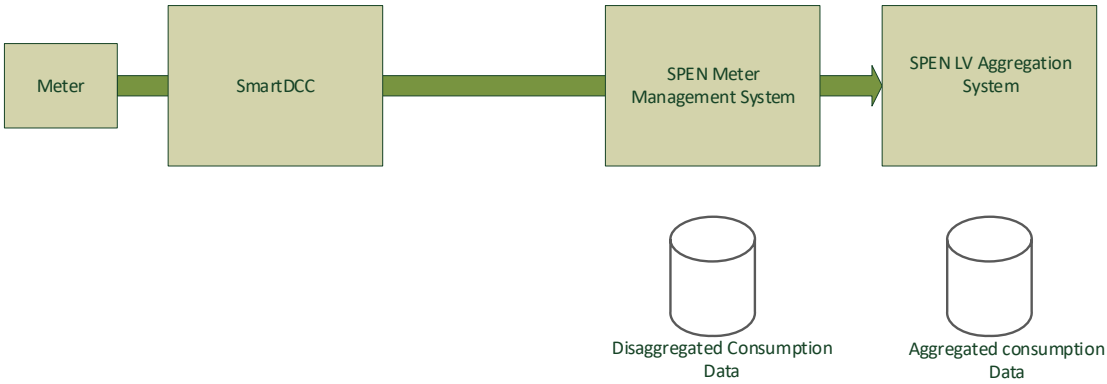

Figure 1. Data management process for smart meter consumption data

In this section we give an overview of the data processing for smart meter data. Appendices 2 and 3 sets out in detail how, where and when SPEN will collate, maintain, use and delete Consumption Data.

Stage 1: Meter & SmartDCC

The Ofgem regulated SmartDCC provides a service which allows disaggregated Consumption Data to be requested on a scheduled basis. Each month SPEN will request a copy of the half hourly meter readings for each customer with a smart meter via the SmartDCC. This data is not anonymised but encrypted in transit, as per SmartDCC specifications, and governed by the Smart Energy Code. The SPEN to SmartDCC data communications are subject to annual review as part of our Smart Energy Code obligations.

Stage 2: Meter Management System

As soon as the unanonymised meter readings reach SPEN's meter management systems the data will be stored securely and may not be accessed via the User Interface, reporting tools or via export interfaces other than that connected to the LV aggregation system.

Therefore, disaggregated consumption data can only be exported to the aggregation model, where it is aggregated to feeder level for use by the SPEN business. Once data is exported to the

aggregation model and successfully aggregated it is deleted from the Meter management system.

Stage 3: SPEN LV Aggregation System

- Disaggregated consumption data is imported to the aggregation model from Meter Management System and the aggregation process starts based on the LV model feeder heads. This data is associated to the LV aggregation model by UPRN or address and so MPAN is not imported to this system. This process is described in more detail in Appendix 3.

- Disaggregated data is removed from the aggregation model and deleted once the aggregation process is complete. Disaggregated data therefore no longer exists in SPEN systems.

- SPEN's LV aggregation system will retain aggregated consumption data in a secure, access-controlled model, specifically:

    - The total consumption for the month to give an aggregate monthly figure for each customer.
    - The minimum and maximum demand identified during the month for each customer MPAN.
    - Aggregated half hourly consumption data for each feeder. This data is therefore no longer associated with an MPAN.

- Where there is only one customer connected to a feeder the data is still held against the feeder ID rather than the MPAN, providing a significant level of protection.

- Across the SPEN's DNO areas, over 99% of customers are served by a feeder with at least 1 other customer and over 94% of customers are located on feeders with 10 or more other customers.

  This table is partly redacted.

Customer Cut-outs/ Feeder	**No. of LV Feeders**	**No. of Customer Cut-outs**	
1 Cut-out			0.83%
2 - 5 Cut-outs			2.55%
6 - 10 Cut-outs			2.19%

11 - 20 Cut-outs			5.10%
21 or more Cut-outs			89.33%
Totals			**100%**

Table 2. Breakdown showing percentage of customers connected to feeders with varying amount of customers

- Hence, the privacy controls put in place, described in the PIA, and the fact that the aggregation model will hold data against the feeder, rather than the MPAN, sufficiently protects the data.

Retention

Aggregated Consumption Data will be retained, managed and destroyed as per SPEN's retention policy on SPEN's secure servers before being permanently deleted. The retention period for this data will be as per SPEN's standard retention cycle of the price control period + 2 years. This is a business wide retention period defined to allow us to accurately report during our price control period and respond to any subsequent queries effectively for a set period of time after the price control ends.

Disaggregated data will be retained for the minimum timeframe necessary to complete aggregation processing.

5. OFGEM CRITERIA 5 - DATA PROTECTION TECHNIQUES

Demonstrate that consideration has been given to the best available techniques for minimisation, aggregation, anonymisation and/or other treatment of data. The ICO's Anonymisation Code of Practice should be used, among other sources, to inform the data anonymisation processes adopted.

Minimisation

SPEN follows ICO guidance on data minimisation specifically:

- We only collect personal data we actually need for our specified purposes.
- We have sufficient personal data to properly fulfil those purposes.
- We periodically review the data we hold and delete anything we do not need.

In implementing the above criteria, we have taken the following steps:

- We have determined to use a monthly read cycle to allow recent data to be available in our LV model for use by our design and connections functions.
- The data is retained for price control period + 2 years in order to answer any questions regarding our processes or performance during that time.
- Disaggregated data is retained for the minimum time required to complete the aggregation process.
- MPANs are not associated with the aggregated data held at feeder level.

Data minimisation is a risk we have identified for treatment (Risk number 5 in Appendix 1 Schedule 1). Our standard treatment plans propose a monthly review of data within the system to ensure we do not retain data that is not used. Data that is identified as pertinent to our processes will be retained as identified in our data retention policy.

Aggregation

We have considered how we can use aggregation within in our systems and our approach is set out in Criteria 4 and Appendix 3. We consider that full anonymisation will mean data has no useful purpose to SPEN from a network management point of view. In addition, as we do not intend to release the data to third parties in a ubiquitous and uncontrolled manner, full anonymisation is not required. Our premise remains that the protections in place in our PIA protect the smart meter data during its use within the organisation and minimise the risk of unauthorised disclosure.

Aggregation is carried out in our LV aggregation system as meter management systems are inherently designed to manage individual meters or group them according to customer, not network, groupings. DNO aggregation requires knowledge of the LV network which is not contained in a meter management system. As a meter management system's main purpose is to keep meter data associated with each meter point, to perform aggregation in this system would therefore require expensive custom system changes and manual creation & maintenance of an aggregation structure i.e. definition of groups of meters which should be aggregated together based on the changing network model. Doing this would not significantly reduce the data exposure risk. An administrator for the Meter management system or LV aggregation model system could access ephemeral disaggregated data, but this would be a highly technical task which would be audited and flagged as fraudulent behaviour. Hence, SPEN have assessed this risk (Risk 4 in Appendix 1) and find it tolerable given the controls we have in place. Aggregating in the Meter management system would, however, significantly increase the cost, potentially to the point where the use of consumption data could not be justified.

It should be noted that the Siemen's Meter management system is covered by an annual external security audit under the Smart Energy Code. This covers systems security and control of vendor's access to the system. SPEN's risk assessment and control measures are fully assessed during this audit.

Anonymisation

By applying our aggregation and minimisation procedures data is pseudonymised as MPANs are no longer directly associated with the aggregated consumption data.

However, as data will not be fully anonymised i.e. re-identification would be difficult, but technically possible, we are proceeding on the basis that data falls within the definition of Personal Data and therefore will be subject to a Privacy Impact Assessment (PIA).

By applying our standard GDPR risk assessment the PIA identifies the legal and security controls that are required to be put in place when processing consumption data for the purposes outlined above. As set out in Appendix 1 (GDPR Risk Assessment PL06) we have identified a need to ensure data subject rights can be exercised. This process is as follows:

- The customer can make a complaint either verbally or in writing. Our preference is in writing sent to the SPEN data protection mailbox : DP@spenergynetworks.co.uk
- We will respond to the customer within one calendar month with our decision

- If the customer is unhappy with the decision, they have the right to go to the ICO. Our privacy policy sets out this information.

6. OFGEM CRITERIA 6 - PRIVACY IMPACT ASSESSMENT

Be accompanied by a Privacy Impact Assessment, consistent with the ICO's code of practice

The SPEN Privacy Impact framework is included in Appendix 1 of this document

7. OFGEM CRITERIA 7 - IT SECURITY PROCESSES

Demonstrate the conformity of the adopted IT security process to the ISO 27001 and ISO 27005 standards in order to exclude any possibility of the DNO re-associating the granular data to a premises after its anonymisation has been achieved

SPEN completed the security assessment of its smart meter systems by a SECAS appointed auditor in 2017, 2018 and 2019. This assessed the systems against the ISO 27001 and 27005 criteria and no major findings have been reported to date.

A key part of this assessment requires SPEN to maintain and provide evidence it is following a Security Management System. This requires SPEN to prove that:

- Only fully authorised users can access these systems;
- An access control method is in place & followed;
- Unauthorised software cannot be deployed;
- System enhancements are to a specified quality and are controlled;
- Regular penetration tests on the system are carried out;
- System security vulnerabilities are known and patched on a regular basis;
- Key users have been security checked;
- Adequate and ongoing user training is in place; and
- A data retention and destruction plan for systems is in place and is followed.

These controls reduce the possibility of aggregated, or transient disaggregated, consumption data being misused. This is further elaborated in the PIA in Appendix 1.

Details of the process and criteria used for SECAS security assessment can be found here: https://smartenergycodecompany.co.uk/assessment-process/.

SPEN's full Security Management System is sensitive information that cannot be provided in a publicly consulted plan.

8. OFGEM CRITERIA 8 - STAKEHOLDER ENGAGEMENT

Demonstrate that, in developing its privacy plan, the DNO has engaged constructively with relevant stakeholders, including consumer groups and those with expertise in approaches to data privacy. The DNO must provide details about the output of such engagement, including how it has responded to the feedback in refining its data privacy plans.

SPEN, via the ENA, has had significant engagement with ICO, Citizen's Advice Bureau and academia to assess the likely impact on and opinion of stakeholders.

Also, via the ENA, SPEN has engaged Ipsos Mori to carry out a customer survey to ascertain customers' attitude to the use of their consumption information for network management purposes, including workshops that were specifically in SPEN licence areas. This showed a broadly positive response to the use of the data as shown here .

In summary, focus groups in SPEN's, and other distribution areas, concluded:

- A general misunderstanding of retail and network operations roles;
- A general concern around data privacy, not specifically related to smart meters; and
- A majority opinion that consumption data was not felt to be sensitive personal data, particularly if not linked to their name & address, and that the benefits of its use outweighed the risks.

There was a clear indication that if customers clearly understand the benefits, to themselves and the environment, they are predisposed to support the use of consumption data.

Data privacy will be a core element of our stakeholder and customer research programme for the next regulatory price control, RIIO-ED2. We will specifically ask customers for their views on data privacy and engage expert consumer and data representatives to attain their views. We will then triangulate the feedback, and this will help inform our business plan submission.

Furthermore, SP Energy Networks currently has a robust and comprehensive Stakeholder Engagement Strategy, which is embedded across the business. This strategy ensures we listen to our stakeholders and act on their feedback every year, right across our business. As part of planned engagement on our digitalisation strategy, we will be asking stakeholders for their views on the use of smart meter data.

These measures will ensure that SPEN continues to engage with consumers and stakeholders to ensure their views are incorporated in the decisions we make.

We also intend to add additional information to our website, alongside the existing privacy notice (set out in Appendix 1 Schedule 3), that sets how SPEN uses smart meter data in its daily tasks and how this information is protected. This information will set out a summary of how

SPEN is using aggregated smart meter consumption data to improve the performance of our network for customers

If the results of these future customer engagement initiatives conflict with the results presented in our Ipsos Mori study, SPEN will consequently alter the way in which we process consumption data to meet stakeholder expectations. In this case, SPEN will amend and resubmit this plan to Ofgem for further assessment.

APPENDIX 1 - PRIVACY IMPACT ASSESSMENT

Executive Summary

SPEN have a GDPR compliant Risk Assessment methodology that is used to assess the privacy risk for all systems as a corporate wide process. This process has been applied to the smart meter system.

- After completing the initial questionnaire (Schedule 1), the smart metering systems have been categorised to have Low and Medium risks to data privacy.
    - Each of these risks is detailed in the **Risk Identification** sections. The mitigation and planned mitigation controls for the risks are listed in the **Risk Assessment** section.
- Schedule 2 sets out our legal basis for the processing of information.
- Schedule 3 sets out our Privacy Notice to inform customers of the use of their data.

The risk assessment is Redacted.

Schedule 1: Initial Risk Assessment Questionnaire

Redacted

Schedule 2: Legal basis for processing of consumption data

Redacted

Schedule 3: SP Energy Networks Privacy Notice

This privacy policy ("Policy") describes how SP Energy Networks ("SPEN") (which includes SPEN plc (company number **SC189125**), SP Manweb plc (company number **02366937**), and SP Transmission plc (company number **SC189126**) collects, stores and uses information that identifies individuals ("Personal Information") in connection with its business activities.

In this Policy, references to "we", "us", and "our" (and other similar terms) means SPEN and "you" and "your" (and other similar terms) mean our customers, contacts, suppliers and website visitors.

Personal Information that SPEN may collect from you and uses made of it.
We may collect Personal Information about you whenever we are in contact with you and if we are in a contract with one another. In particular, we may collect and process the following information about you:

- Information that you provide by filling in forms on our website. If you contact us by phone, email or post, we may keep a record of that correspondence and technical information collected by automated means such as smart meters.
- We may also ask you to complete surveys that we carry out for regulatory reasons, for example when required by Ofgem, although you do not have to respond to them. When we enter into a contract or agreement with you. This includes the information you provide about you or your property.

Please note that we will assume, unless you tell us otherwise, that we may use and disclose your Personal Information in such a manner as we believe is reasonably necessary to provide our services to you (including as described in this Policy and as otherwise agreed between us). More specifically we will collect, store and use your Personal Information for the following purposes:

If you contact us in an emergency
We will collect your name, email address, phone number, and the best time to reach you, the urgency of your enquiry, and your preferred way of being contacted and the nature of your query so we can respond to your query in the most efficient way

If you contact us because your power is out
We will collect your personal contact details for the purpose of contacting and corresponding with you. We will also collect your address (including postcode) so that we can investigate and resolve the problem.

If you are going to experience a planned power cut
We will attempt to contact you at your home in advance of the work commencing to check the information we hold for you is accurate. We will, with your consent, update our records where new information such as name, address and contact details have changed. We will confirm if anyone in the property requires to be registered on our Priority Services Register for additional support. We will use this information to write out to you in advance of the work to

confirm the date and time and text you where you have provided a mobile number to remind you of the work just before it starts.

If you contact us because you require a new or upgraded connection to our network

If you contact us to make a new connection or change an existing connection we will collect your name, address, phone number, details about your property, access arrangements and other site-specific details for the purposes of carrying out the works.

If you contact us with a general enquiry

We will collect your personal contact details for the purpose of contacting and corresponding with you. We will also collect your address (including postcode) so that we can deliver the service you require.
Information will be shared with Service Partners working on our behalf delivering the above services.

If you are a landowner

We will collect details of your property, your name, information regarding any wayleaves, servitudes, easements or consents over your property, how long you have owned it and details of any co-owners or others with rights over your property, for the purposes of obtaining access to or placing equipment on your property.

If you are on our Priority Services Register

We will collect your name, address, contact details, the nature of the support you require should you have a power cut. We will use this information to proactively contact you in the event of a power cut. We will also share this information with your electricity supplier & their agents (whoever you chose to pay your bill to) with your consent in order that they may provide the required support.

If you contact us to request one of our Extra Help Support Services

We will collect you name, address, contact details and the support service you require. We will, with your consent pass your details to our partner delivering the services on our behalf in order that they can contact you and provide the service requested. We will get feedback from our partner when the service is completed and contact you to make sure you are satisfied

If you are a supplier (or prospective supplier) to SPEN

We may collect, store and use your personal and/or professional contact details for the purpose of contacting and corresponding with you, as well as contact details for any organisation that you represent.
We may also collect your Personal Information through materials you may provide to us in relation to the services you supply to us, as well as your bank account and/or other payment details for the purpose of paying your fees.

Other uses of Personal Information:

On occasion we may collect additional Personal Information for a specific purpose. In such circumstances we will try to provide specific additional notice about that processing and purpose at the time those data are collected, and any disclosures made, and information given at the point of such collection will also form a part of this Policy.

Who we share your Personal Information with:
We use consultants, suppliers and contractors to help us provide services and we give them Personal Information but only to the extent they need it to carry out their specific tasks. We have contracts in place with them containing obligations regarding the use, security and of Personal Information to ensure that it is protected as much as possible.

Providing information to SPEN about third parties:
You should not give us Personal Information about someone else (such as alternative named contacts, co-owners or next of kin) without first getting their consent for it to be disclosed and used by us. If you provide such third-party information we will assume they have consented, although we may still ask for confirmation.

Where SPEN stores your personal data and security measures:
We have in place what we believe to be appropriate technical and organisational security measures to protect your Personal Information against unauthorised or unlawful use, and against accidental loss, damage or destruction. We put in place strict confidentiality agreements (including data protection obligations) with our third-party service providers. We will not pass any Personal Information collected to third parties for marketing purposes unless we tell you specifically.
Your Personal Information may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may be accessed by SP group companies and may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the provision of support services. By submitting your Personal Information, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your Personal Information is treated securely and in accordance with this Policy.
Unfortunately, the transmission of information via the internet is not completely secure. If you provide Personal Information to us via our websites, we will do our best to protect it, but we cannot guarantee its security and any transmission is at your own risk. Once we have received your Personal Information, we will use strict procedures and security features to try to prevent unauthorised access.

Cookies
Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie.

Cookies enable us to:

- Ensure our websites are working correctly

- Offer you a customised web service
- Continually improve our websites for you

We do not use cookies to collect any Personal Information

Managing Cookies: If you want to remove any cookies already set, you can do so from your browser. You can find out how to do this by going to the help menu in your browser. Further information can be found on your browser's site.

Other circumstances in which SPEN may disclose your Personal Information

- We are regulated by Ofgem and sometimes they request information that includes Personal Information. For example, where they request information on areas affected by power cuts or in relation to low carbon initiatives. We take steps to ensure that any information provided to Ofgem is provided securely.
- We may disclose your Personal Information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries.
- We may disclose your Personal Information to third parties:
    - In the event that we sell or buy any business or assets, in which case we may disclose your Personal Information to the prospective seller or buyer of such business or assets, but only if such disclosure is reasonably required for the purposes of the sale or purchase;
    - If all or substantially all of our assets are acquired by a third party, your Personal Information may be one of the transferred assets;
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of SPEN our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

What are your rights?

In accordance with the GDPR, you can contact us at DP@spenergynetworks.co.uk to exercise any and all of the following rights that you have in relation to our processing of your personal information:

- Right of access – you have the right to obtain confirmation that your personal information is being processed and access to your personal information
- Right to rectification – you have the right to have your personal information rectified if it is inaccurate or incomplete
- Right to erasure (Right to be forgotten) – you have the right to request the deletion or removal of your personal information where there is no compelling reason for its continued processing by us
- Right to restrict processing – you have the right to request that we block or suppress processing of your personal information
- Right to data portability – you have the right to obtain and reuse your personal information for your own purposes across different services as the processing is based on your consent

Additionally, you have the right to lodge a complaint with our Data Protection Officer at dataprotection_corporate@scottishpower.com if you believe that your personal information is not being processed in line with this privacy notice. If you are not satisfied with the response, you have the right to lodge a complaint with the UK Information Commissioner's Office (ICO) by contacting:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113
Version Update May 2018

APPENDIX 2: LV AGGREGATION SYSTEM USER PROFILES AND INTERACTIONS

Redacted

APPENDIX 3: COLLECTION, MAINTENANCE, USE AND DELETION OF CONSUMPTION

Redacted

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