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# Commissioner Cavoukian partners with major utilities to announce the Gold Standard for building privacy into the Smart Grid

New guidance document reveals best practices for protecting electricity users' personal information

TORONTO – Ontario Information and Privacy Commissioner, Dr. Ann Cavoukian, today launched a publication to guide utilities in how to ensure that consumers' personal information is protected as the electrical grid becomes "smarter." The Commissioner partnered with Hydro One and Toronto Hydro to develop the new guidance document titled *Privacy by Design: Achieving the Gold Standard in Data Protection for the Smart Grid.* The publication outlines best practices for embedding privacy within Smart Grid systems, right from the outset, based on Ontario's own emerging Smart Grid.

The Smart Grid, essential to the future provision and conservation of energy, will drive an increase in the amount of digitized information gathered relating to consumer activities within their homes. In many cases, the infrastructure will be capable of informing consumers' hourly and real-time energy use, down to the appliance level. The paper states that, "The Smart Grid's impact is being compared to the advent of the Internet, which was built without privacy in mind, and which now faces an extreme impediment and very high levels of scrutiny regarding privacy."

"The Smart Grid presents new opportunities for growth and innovation, as well as new challenges that must be addressed with regard to collecting more granular data than ever before on customers' energy consumption," says Commissioner Cavoukian. "I am delighted that Ontario's largest electricity companies are demonstrating clear leadership in this space. We believe that this best practice document will assist all utilities, including those in the United States and around the world, to understand how Fair Information Practices and *Privacy by Design* may be incorporated into the architecture of Smart Grid systems."

Hydro One and Toronto Hydro were approached by the Commissioner's office to contribute and offer input to the publication. The two utilities provide electricity to over two million households in Ontario, a province with comprehensive privacy laws. These companies are also involved in several Smart Grid activities that have encompassed strong privacy protections – uniquely positioning them to understand how to implement large scale systems while at the same time, respecting privacy.

"It's important to build in information security and privacy from the very first stages of system development. Hydro One is in full agreement with the Commissioner about the importance of safeguarding data and preserving customer privacy as part of everything we do," said Laura Formusa, President and CEO, Hydro One.

"The modernization of Toronto Hydro's grid is now underway, and our customers will soon be able to exercise more control over how and when they use electricity. Homes and offices will interact with the grid as power consumption shifts due to price signals and distribution system conditions," said Anthony Haines,



President and CEO, Toronto Hydro. "Building privacy protocols into our strategies at the front end will help us roll out new programs more quickly, because consumers will have confidence that their personal information is not at risk of being exposed without their consent."

Privacy by Design (PbD) is a concept developed by the Commissioner back in the '90s that has been widely adopted globally by a growing number of organizations and jurisdictions. It prescribes that privacy be embedded directly into the design and operation, not only of various technologies, but also of business processes and networked infrastructure. Instead of treating privacy as an after-thought – "bolting it on after the fact" – PbD is proactive and preventative in nature – a highly effective approach in today's world of increasingly interconnected technologies and extensive data collection. (For more information, see <a href="https://www.privacybydesign.ca">www.privacybydesign.ca</a>.)

The guidance document, *Privacy by Design: Achieving the Gold Standard in Data Protection for the Smart Grid*, is available on the Commissioner's website at: www.ipc.on.ca

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