

**BEFORE THE  
DEPARTMENT OF COMMERCE**

**NATIONAL INSTITUTE OF STANDARDS AND TECHNOLOGY**

Request for Comments

REPORT TO NIST ON THE SMART GRID  
INTEROPERABILITY STANDARDS ROADMAP

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COMMENTS OF THE FUTURE OF PRIVACY FORUM

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## INTRODUCTION

Information is what will charge the smart grid. The many ways in which data about consumer demand will be used for smarter electricity provision have the potential to revolutionize the electricity industry and to benefit society. However, this very same information about consumers will create major concerns if consumer-focused principles of transparency and control are not treated as essential design principles from start to end of the standards development process. Principles of privacy by design must be part of the overall design for smart grid data flows. NIST should create a stakeholder group that can be positioned to look at the grid data flows as a whole and from a consumer perspective. Flagging privacy risks by specific technology or business need is unlikely to allow for useful guidance that captures the range of potential impacts to consumers.

## OVERVIEW

Smart meters are being installed throughout homes across the country. The Federal Energy Regulatory Commission (FERC) recently reported that 52 million smart meters will be installed throughout the country over the next five to seven years. As a result of these devices, detailed information about consumer electricity usage will travel from residences to electric utilities and other providers. Electric utilities and other providers may have access to information about what customers are using, when they are using it, and what devices are involved.

Furthermore, as plug-in hybrid electric vehicles are deployed and customers engage in electricity sales on the grid outside of their homes, an electricity usage profile could become a source of behavioral information.

Responsible management of this information could support energy efficiency efforts and demand-side management initiatives. However, insufficient attention to transparency and consumer control, given the could lead to consumer resistance due to privacy concerns.,

If information is gathered responsibly, in keeping with consumer-centric principles of transparency and control, advancing demand side initiatives, efficiency investments, and conservation efforts will all be possible. A loss of consumer trust would create significant opposition to smart grid deployment efforts. It is thus essential that all actors in the smart grid recognize the user centric customer focus that must underlie interoperability decisions planning. The NIST Standards Roadmap can ensure consumer trust by ensuring that privacy is addressed in more than a piecemeal manner.

We applaud the fact that, in numerous locations in the document, the draft interim Standards Roadmap recognizes the importance of protecting the privacy of consumer information. NIST should create an advisory group of advocates, academics and business experts who can be positioned to look at the grid data flows as a whole and from a consumer perspective. Flagging privacy risks by specific technology or business need is unlikely to allow for useful guidance that captures the range of potential impacts to consumers. Principles of privacy by design must be part of the overall design for smart grid data flows.

The Future of Privacy Forum (FPF) is a Washington, DC based think tank that seeks to advance responsible data practices. The forum is led by Internet privacy experts Jules Polonetsky and Christopher Wolf and includes advisory board comprised of leading figures from industry, academia, law and advocacy groups. FPF was launched in November 2008, and is supported by AOL, AT&T, Deloitte, eBay, Facebook, Intel, Microsoft, The Nielsen Company, Verizon and Yahoo.



