

CDT Details Smart Grid Privacy Recommendations to California Public Utilities Commission

October 15, 2010

Today, [CDT submitted comments](#) [1] to the California Public Utilities Commission detailing how privacy can be protected as Smart Grid technologies are deployed. The comments propose a comprehensive set of privacy policies and practices for the extensive and revealing data that the Smart Grid will generate about home energy usage. While the CDT proposal is based on the widely-accepted framework of Fair Information Practices, this is the first time, as far as we know, that anyone in the U.S. has translated those principles into practical rules that can be implemented in the Smart Grid.

The Electronic Frontier Foundation joined CDT's filing. The Samuelson Law, Technology and Public Policy Clinic at UC Berkeley School of Law represents CDT.

The California PUC is conducting a major proceeding intended to promote development of the Smart Grid in California. In March, CDT and EFF [submitted comments](#) [2] to the PUC, arguing that the Smart Grid needed a comprehensive set of privacy rules based on the Fair Information Practices. The Commission embraced the CDT-EFF position, setting the stage for today's filing on how to "operationalize" those top level principles.

The proposed policies include the following:

- All customers should be provided with provided short, clearly written notices of the policies followed by Utilities and others handling household energy data
- The notices should specifically describe what household energy usage information is collected and for what purposes
- Companies should collect and store only the minimum data needed to accomplish the specified purposes
- Customers should be able to access and verify the accuracy of their own household energy information
- Utilities and others should be required to obtain express, prior, written authorization for each disclosure of Data for purposes not directly related to the provision of energy

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Links:

[1] <http://cdt.org/comments/joint-comments-cdt-and-eff-proposed-smart-grid-privacy-policies-and-procedures>

[2] <http://cdt.org/comments/joint-comments-cdt-and-eff-proposed-policies-and-findings-pertaining-smart-grid>