



SMART METERING IMPLEMENTATION
PROGRAMME: A CALL FOR EVIDENCE ON DATA
ACCESS AND PRIVACY RESPONSE (AUGUST
2011) TO:

Department of Energy and Climate Change (DECC)

October 13, 2011



Trilliant

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SECTION 1.

Annex 1 – Digest of Questions



Introduction

Trilliant fully supports the Government in its vision of every home in Great Britain to be equipped with Smart Metering Equipment, with businesses and public sector users also having smart or Advanced Meters suited to their needs. As a key stakeholder in this process, Trilliant appreciates the opportunity to help shape the framework for implementing this vision. Trilliant believes that sharing our knowledge and expertise in this area will also help the Government achieve its vision.

Trilliant has responded to the questions posed where our input was felt to be most useful. Trilliant believes that the privacy policy framework should be delivered by regulation. Consumer confidence is paramount as can be witnessed in smart metering deployments globally.

About Trilliant

Trilliant provides communication solutions that deliver on the benefits the Smart Grid to utilities and their customers. These benefits include enhanced energy efficiency, improved grid reliability, lower operating costs, and integration of renewable energy resources. Trilliant currently has more than 200 utility customers including Centrica, Iberdrola USA, and Hydro One Networks, and is backed by prominent investors such as ABB, GE, Investor Growth Capital, MissionPoint Capital Partners, UMC Capital, VantagePoint Venture Partners, and zook ventures. For more information, visit www.trilliantinc.com.

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Trilliant Response to Annex 1 – Digest of Questions

13.	Do you consider that use of data by network companies to support them in maintaining an efficient and economic network should be considered a regulated duty?
	<p>Trilliant Response:</p> <p>Trilliant believes there are areas that need to be regulated and other areas that should not be regulated. The network companies need to have the flexibility to be able to use data to design and characterize their networks and as such, should not be regulated. Access to these data is needed in order to maintain the highest level of service and the data will be constantly changing. For these purposes, the data should not be related to a house or individual but should be aggregated data and should not be regulated. When it comes to handling information that contains personal information, this should be regulated.</p>
19.	What parts of the privacy policy framework do you think should be delivered by regulation and why?
	<p>Trilliant Response:</p> <p>Trilliant believes that the privacy policy framework should be delivered by regulation. In the foundation phase, it is important to set a basic framework so that everyone follows the same policies. This is crucial so the consumer can have a high level of confidence that their data will be kept secure. Without regulation, the consumer could be left guessing as to how their personal information is handled and will be resistant to adopting smart metering.</p>
21.	What practical options for authentication would provide the right balance between allowing easy access to consumer data in the home while providing the necessary privacy protection? Are there any other issues or options that the programme should be considering in developing the approach in this area?
	<p>Trilliant Response:</p> <p>Practical options for authentication include:</p> <ul style="list-style-type: none"> Loosely couple, and clearly define system interactions between authentication in the head-end system (e.g., consumer portals) and authentication between consumer in-home devices and Smart Grid elements (e.g., Communications Hub). Authenticate devices, not customers, when possible to minimize personally identifiable information required by the system. Not going straight to the SMHAN; have the information come from the Internet Creating a Web portal to get the information from and authenticate the consumer using information already on record If it's necessary to go straight to the SMHAN, the operator of the SMHAN should set up a way to give a one-time limited token to get the consumer HAN to talk to the SMHAN. Once this communication is established and the two networks are connected, the two networks can automatically establish an ephemeral secret key to communicate with each other. Utilize appropriate level of authentication (e.g., originator, mutual) for the anticipated data access and privacy needs. UCAIug OpenHAN 2.0 provides a framework for evaluating public and consumer-private use cases and architectural options.
22.	Are there other issues that need to be considered to make using the HAN a viable route for access to data in the home, from either a process or consumer perspective?
	<p>Trilliant Response:</p> <p>Issues that need to be considered to make using the HAN a viable route for access to data in the home include:</p> <ul style="list-style-type: none"> Opens up to an avenue of attacks Risk of exposing consumer data

	<ul style="list-style-type: none">• Burden on supporting the network• Consider utilizing the Smart Grid edge element (e.g., Communications Hub) as an “information diode” that only allows data flow into the home to reduce the risk to Smart Grid threat vectors originating inside the HAN. This approach also enhances the privacy perseverance of consumers.• A consumer’s HAN should not route grid data in order to maintain clean separation of grid system from consumer system.
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