
Intervention on GDPR & experience from Denmark

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Data from smart meters is a key enabler for digitalisation



READY Manager 1.6

Heat meter (E1)
8-2 °C ...180 °C
M9-3 K...178 K

Cooling meter (E3)
8-2 °C ...180 °C
M9-3 K...178 K

003029 MWh

CEM7 (v200)
DK-0000-M90A-040
ip: pH See display

80000095 kamstrup

S/N: 80000095K817
Type: 603CZ19
P1500-EN60751
Battery: 1 x D-cell

READY Manager

Search for meter

Groups

- All meters 4
- Non-grouped meters
- Last imported meters
- Priority meters
- Hovedmålere
- Industrivej 28
- Industrivej 39

READY Manager 1.3

Meter readings

65300224 - Nørregade

From: 13/09/2015 To: 23/09/2015

Visualization Readings Logger data

Values: Pressure Show info codes Max. pressure 4.80 bar Min. pressure 4.40 bar

Bar

22 Sep 2015 05:15

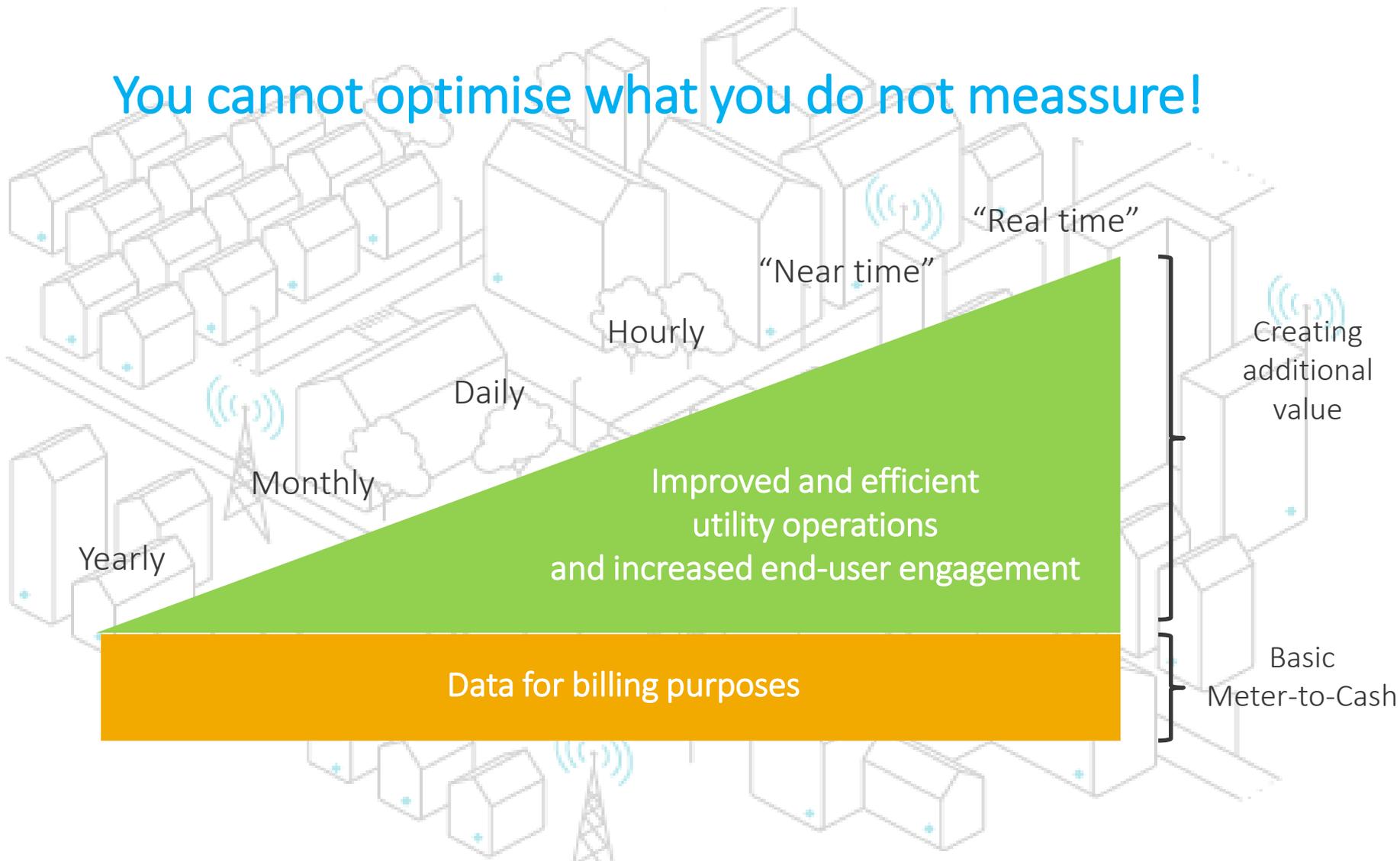
4.86 bar

4.64 bar

READY Manager

Reading time	Address	Serial number	Info code	Info code (historical)
21/07/2021 04:00	Plantagevej 13389	13020640	▲ Specify meter type to see info codes)	
21/07/2021 03:00	Fjordvej 7188	13049610	▲ Leak: Reverse	Burst has been recorded for 1 - 8 hours within the last 30 days; Leak h...
21/07/2021 02:00	Kjølshøjvej 4309	13014618	▲ Leak: Dry	Leak has been recorded for 1 - 24 hours within the last 30 days; Rever...
21/07/2021 01:00	Fjordvej 1403	13021305	▲ Specify meter type to see info codes)	
21/07/2021 00:00	Fjordvej 4834	13076014	▲ Specify meter type to see info codes)	
20/07/2021 23:00	Fjordvej 3631	13024617		Leak has been recorded for 9 - 24 hours within the last 30 days; Rever...
20/07/2021 21:00	Hornsmønstergade 13961	13011902	▲ Leak: Reverse	Leak has been recorded for more than 21 days within the last 30 days;...
20/07/2021 20:00	Guldfalkvej 463	13022130	▲ Supply voltage has been interrupted: Temperature sensor T2 outsid...	
20/07/2021 19:00	Sjælland 1087	13011373	▲ Reverse: Dry	Burst has been recorded for 1 - 8 hours within the last 30 days; Rever...
20/07/2021 18:00	Vedhøjvej 3475	13009963	▲ Burst: Reverse	Leak has been recorded for 9 - 24 hours within the last 30 days; Rever...
20/07/2021 17:00	Fjordvej 8152	13013603	▲ Burst: Leak	Leak has been recorded for 7 - 14 days within the last 30 days; Rever...

You cannot optimise what you do not measure!



Value creation examples within district energy



Is smart meter data really personal data?

Smart meter data is an essential part of the digitalisation process

Article 29 Working Party has concluded that smart meter data is considered personal data and is therefore covered by the GDPR

The Article 29 Working Party is an advisory board of representatives from the data protection authority of each EU Member State, the European Data Protection Supervisor and the European Commission. Its main stated missions include providing expert advice, opinions and recommendations regarding data protection to MS, the Commission and the public.

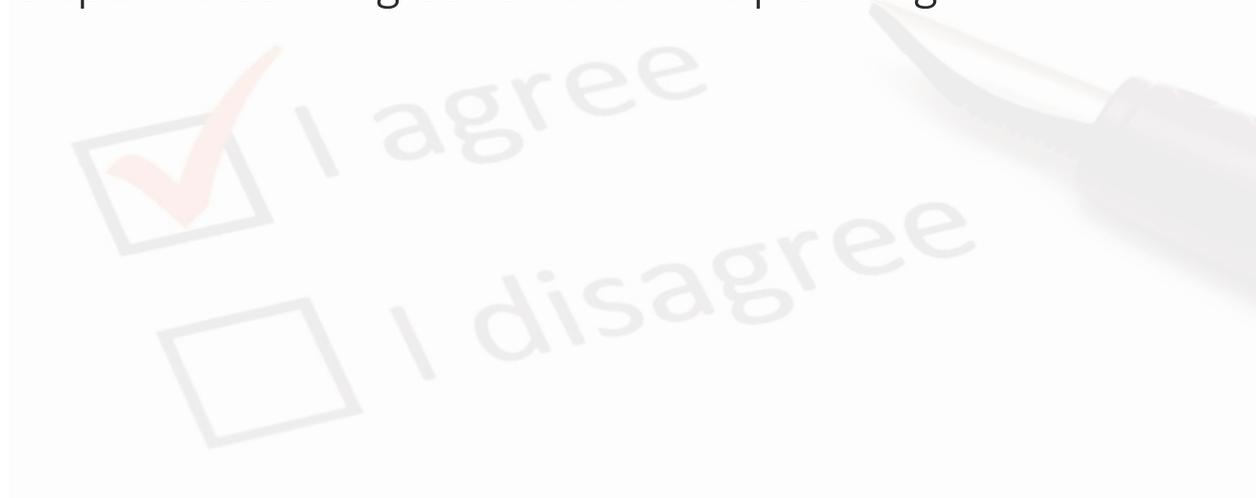
Is end-user consent necessary?

Because smart meter data is personal data, processing it raises the question of the need for individual customer consent ...

... especially when meters are read more frequently than required for billing purposes and consumer information, e.g. on hourly basis

Knowing that end-user consent is an administrative burden

Knowing that lack of consent will have a negative effect on the data-based optimisation – not just for a specific building but also for the planning and distribution



The Danish Energy Agency and Department of Justice has looked into whether legal basis for processing smart meter data can be found in Article 6 of the GDPR: **Lawfulness of processing**

In relation to smart meter data, points (e) and (f) of paragraph 1 of Article 6 are relevant

They state that **processing of personal data is lawful to the extent** that:

(e) processing is necessary for the performance of a task carried out in the **public interest** or in the exercise of official authority vested in the controller;

(f) processing is necessary for the purposes of the **legitimate interests** pursued by the controller or by a third party (...)

In conclusion, the official Danish position states that the frequent data collection from heat meters **can be done without customer consent** as long as the energy supplier uses that data either in the interest of the public to save energy and **minimise energy losses**, or for the legitimate purpose of **improving the energy efficiency** of its operations

A key point about the Danish conclusion is that although processing of personal data is allowed according to the above interpretation of Article 6, it may only take place if providers of smart metering solutions also **comply with the fundamental principles set out in Article 5** on processing of personal data.

Five principles to ensure GDPR compliance

1. Encryption of data

2. Role-based access to data

3. Logging of activities

4. Multiple layers of security in the design

5. Contingency plan

The digitalisation of district heating should not become a question of what is more important – data privacy or energy efficiency. Inspired by the Danish interpretation, we believe that the two can co-exist

Instead, focus should be on ensuring the right interpretation of the GDPR – the one that will enable both consumers, energy suppliers and the environment to reap its many benefits without tripping over good but conflicting intensions.

The lever will be full transparency of data processing, because ultimately, the GDPR is all about trust.

Think forward!

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