

ARTICLE 29 Data Protection Working Party



Brussels, 25 April 2012

Philip Lowe
Director General
DG Energy
European Commission
B - 1049 BRUSSELS
Belgium

Dear Mr Lowe,

Please find attached the opinion of the Article 29 Working Party on the Data Protection Impact Assessment Template for Smart Grid and Smart Metering Systems ('DPIA Template') prepared by Expert Group 2 of the Commission's Smart Grid Task Force.

The Working Party recognises the progress made on the DPIA Template but is nevertheless of the opinion that it is -in its current form- not sufficiently mature. The Working Party therefore recommends the Commission to take the necessary steps to ensure that work on the DPIA Template continues and that the final deliverable will provide sufficiently specific, useful and clear practical guidance to data controllers allowing them to better assess the privacy risks. To facilitate further progress, the Working Party has provided specific recommendations in Annex 1 of the Opinion.

The Working Party further recommends that the Commission consider integrating the content of the "best available techniques" document (BATs) into the DPIA Template and submit the integrated document to the Working Party for another opinion. Further, and more broadly, the Working Party recommends the Commission to consider taking stock of past and on-going work in the field of DPIAs and to consider the opportunity of defining a generic DPIA methodology from which field specific initiatives could benefit.

Yours sincerely,

Jacob Kohnstamm
Chairman

This Working Party was set up under Article 29 of Directive 95/46/EC. It is an independent European advisory body on data protection and privacy. Its tasks are described in Article 30 of Directive 95/46/EC and Article 15 of Directive 2002/58/EC.

The secretariat is provided by Directorate C (Fundamental Rights and Union Citizenship) of the European Commission, Directorate General Justice, B-1049 Brussels, Belgium, Office No LX-46 01/190.

Website: http://ec.europa.eu/justice/policies/privacy/index_en.htm