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