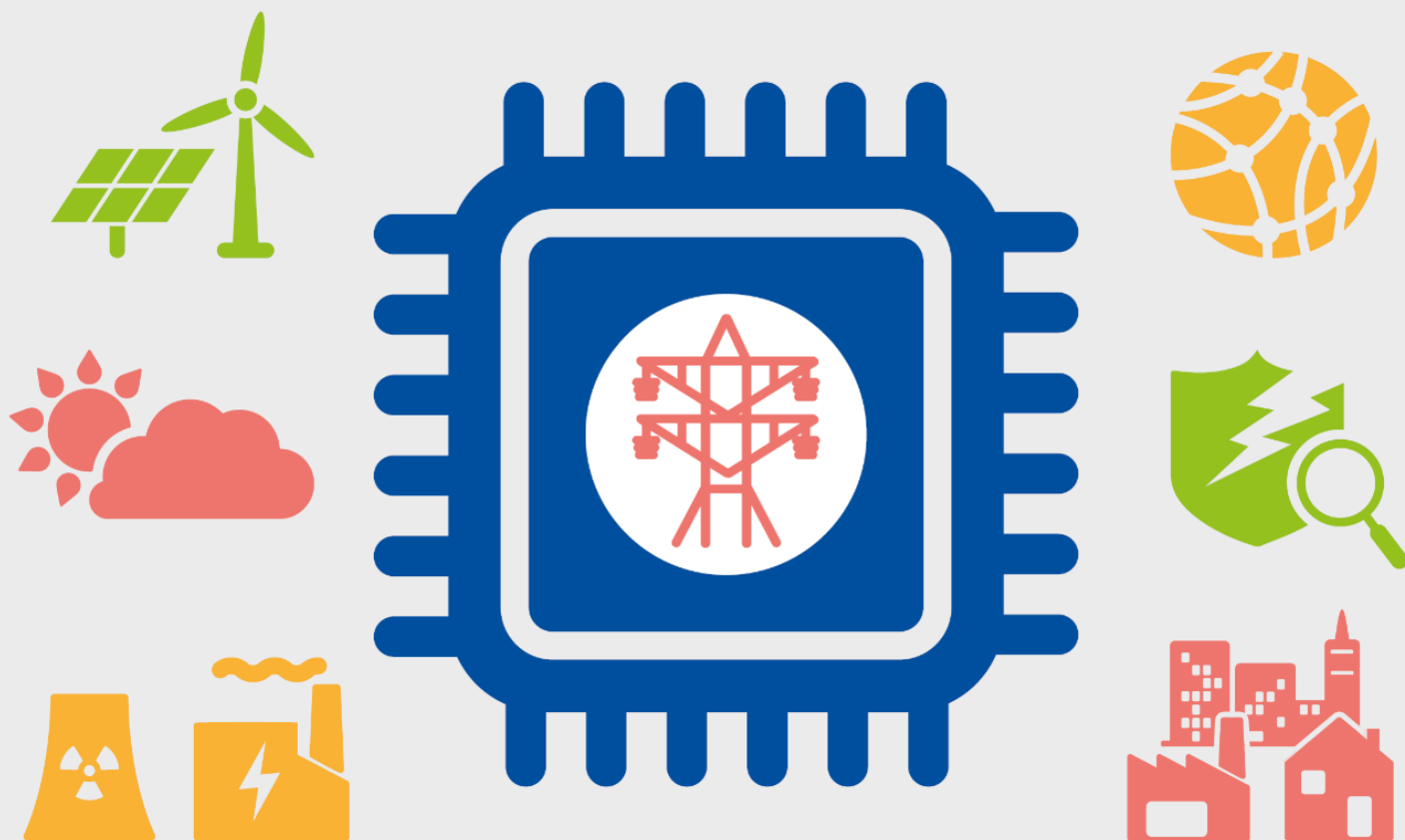




EUROPEAN UNION AGENCY  
FOR CYBERSECURITY





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**Cybersecurity Challenges of Artificial Intelligence<sup>1</sup>  
Algorithms<sup>2</sup>**

**Securing Machine Learning**



This new report analyses cybersecurity and privacy requirements and measures in use of AI in forecasting demand on electricity grids. The report describes the scenario fundamental principles (assets, actors processes etc.), identifies the security and privacy risks it poses, and finally cybersecurity and privacy controls, which counteract the identified risks.

## 1.1 STUDY OBJECTIVES

- Forecasting Demand on Electricity Grids
- 
- 



## 1.2 METHODOLOGY

- 
- 
- 

### 1.2.1 Description of the scenario

- 
- 
- 
- 
- 
- 
- 
- 

### 1.2.2 Identification of cybersecurity and privacy threats and vulnerabilities

### 1.2.3 Identification of cybersecurity and privacy controls

- 
- 

## 1.3 TARGET AUDIENCE

---





- All actors (private or public):
- AI technical community, AI cybersecurity and privacy experts and AI experts
- Cybersecurity and privacy community

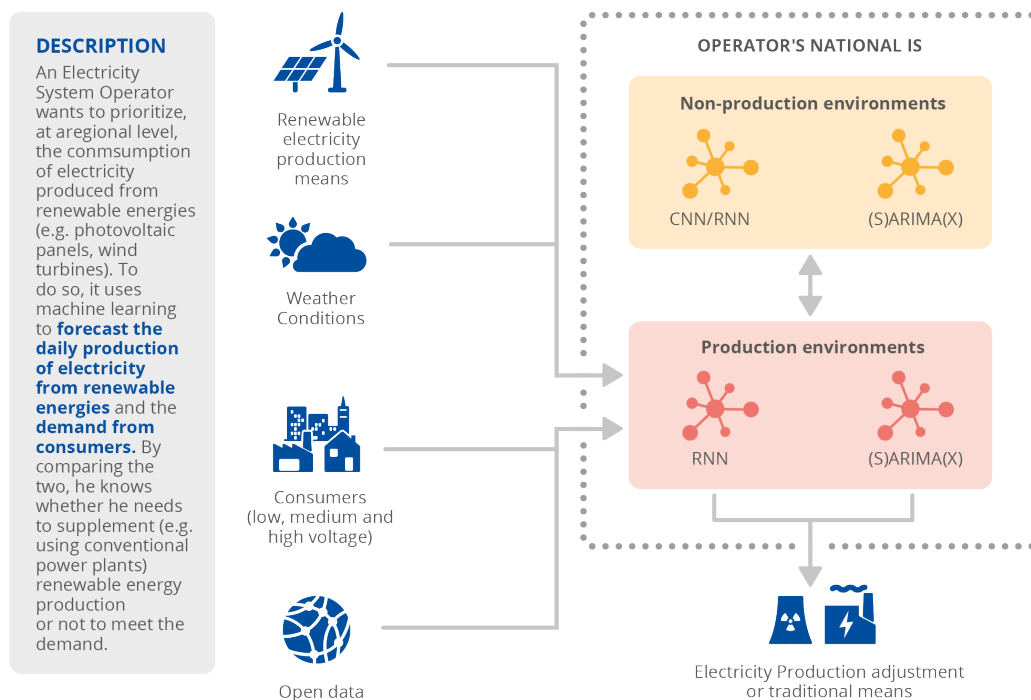
## 1.4 USING THIS DOCUMENT

- 
- 
- 



**Figure 1:**

## FORECAST DEMAND ON ELECTRICITY GRIDS



### DATA

#### Input data

- Material characteristics of renewable electricity production means
- High resolution weather data
- Demographics
- Current daily Energy consumption
- Calendar

#### Output data

- Energy production from renewable energies
- Energy consumption

### CYBERSECURITY AND PRIVACY REQUIREMENTS

#### Cyber requirements

- Availability ● Integrity ● Confidentiality ● Traceability

#### Privacy Requirements

- Availability ● Integrity ● Confidentiality ● Traceability
- Lawfulness
- Fairness
- Transparency
- Purpose limitation,
- Data minimization,
- Accuracy
- Storage limitation
- Security of personal data
- Database creation,
- Compliance of the training model

- Critical ● High ● Low

### ACTORS

- Energy System Operator's teams
- Electricity consumers
- Open-data providers
- Data scientists
- Developers and Data Engineers
- System and communication network's administrator

### ASSETS

- RNN & SARIMAX – renewable energy & consumption forecast algorithms
- Data lake & Model server – on premises
- Open Data provider APIs
- Smart Meter & Concentrator
- Operator's electrical grid
- Integrated Development Environment
- Libraries
- Communication protocols and network



**2.1 PURPOSE AND CONTEXT**

- 
- 
- 
- 
- 
- 

**2.2 HIGH-LEVEL DESCRIPTION**

supervised learning

collected in a data lake



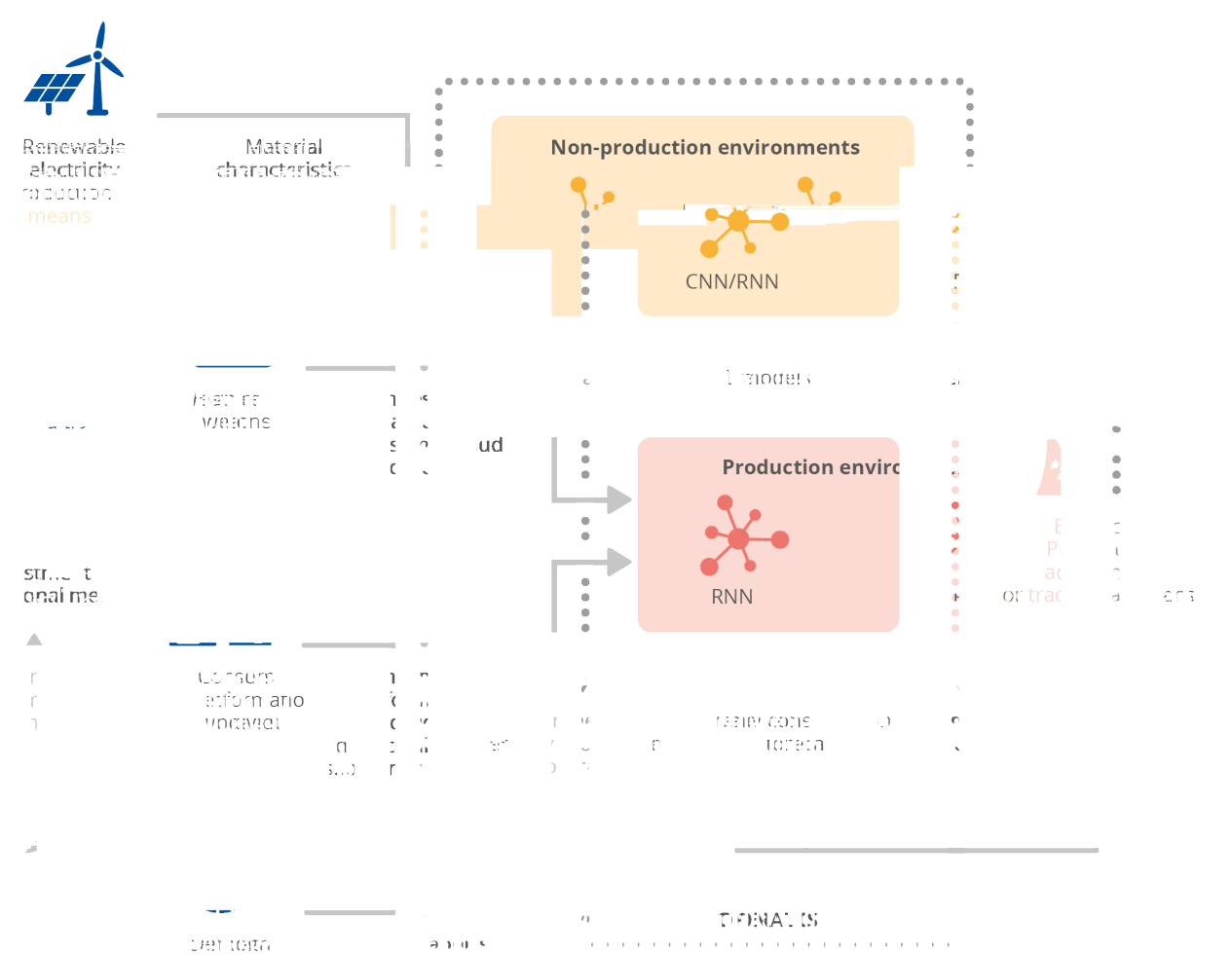
Selected data are then used to create two machine learning models.

These two models produce the following outputs

- 
- 

dashboard tool

Figure 2:



### 2.3 ACTORS AND ROLES



Figure 3:

| Actor   | Role  | Description |
|---|---|-------------|
| Electricity supplier's teams                    | End Users and Data Owner ( <b>Data Controller</b> ) |             |
| Electricity consumers                           | Data Provider                                       |             |
| Open-data providers                             | Data Provider                                       |             |
| Data scientists                                 | Data scientist                                      |             |
| Developers and Data Engineers                   | Developers and Data Engineers                       |             |
| System and communication network administrators | Network administrators                              |             |

## 2.4 PROCESSED DATA

Figure 4:



| Data | Data type | Source / data provider                               | Data Procurement |
|------|-----------|--|------------------|
|      |           | the electricity system<br>electricity supplier       |                  |
|      |           | Open-data<br>provider                                |                  |
|      |           | i.e., the electricity system<br>electricity supplier |                  |

Figure 5:

| Data | Data type | Source / data provider                          | Data Procurement |
|------|-----------|---|------------------|
|      |           | Open-<br>data provider                          |                  |
|      |           | Open-data provider                              |                  |
|      |           | the electricity<br>system electricity suppliers |                  |



|  |  |   |  |
|--|--|---|--|
|  |  | the electricity<br>system electricity suppliers |  |
|--|--|---|--|

## 2.5 MACHINE LEARNING ALGORITHMS

Figure 6:

| Learning paradigm | Subtype | Algorithm | Type of data ingested | Description |
|-------------------|---------|-----------|-----------------------|-------------|
|                   |         |           |                       |             |
|                   |         |           |                       |             |

## 2.6 ASSETS

---

Neda Tavakoli; Sima Siامي-Namini; Akbar Siامي Namin.  
 B, Prabadevi, et al.  
 Abualig, Laith, et al.



Figure 7:

| Type of asset     | Asset       | Description |
|-------------------|-------------|-------------|
| Models            |             |             |
|                   |             |             |
| Environment tools | on-premises |             |
|                   |             |             |
|                   |             |             |
|                   |             |             |
|                   | on-premises |             |
|                   | on-premises |             |
|                   |             |             |
|                   |             |             |
|                   |             |             |
|                   |             |             |

## 2.7 OVERALL PROCESS





## Data collection

(material characteristics, and production history  
electricity supplier

data

weather

meteorological services

This data is considered as open-data and is therefore non-proprietary and free to use.

electricity consumption of the inhabitants

The electricity supplier collects their electricity consumption from smart meters installed locally at the consumers' place<sup>21</sup>

personal data

- 
- 
- 
- 

The default or detailed consumption values (if the consumer has agreed to share this information for the purpose of the processing) are kept and then aggregated (i.e., summed with all other consumption data) in a large consumption database

---



. This aggregated data does not allow for the retrieval of consumer data. It is therefore anonymised data.

demographics

calendar

Data cleaning and data pre-processing

collected data    cleaned

pre-processing

Model design and implementation

- A Recurrent Neuronal Network (RNN)
  -
- A Seasonal AutoRegressive Integrated Moving Average with eXogenous variables (SARIMAX)
  -

---

Brownlee, Jason.

Lee, Donghun and Kim, Kwanho.

Pavicevic, Milutin and Popovic, Tomo

Elamina, Niematallah et Fukushima, Mototsugu

Sim, Sze En, et al.





model's parameters

Model training, model testing and optimisation  
training method

extreme weather conditions

Model Evaluation  
evaluate the model

Model Deployment  
model deployment

- 
- 

Monitoring and inference



monitoring

Figure 8:

| Steps                           | Description | Actors | Assets |
|---------------------------------|-------------|--------|--------|
| Data Collection                 |             |        |        |
| Data Cleaning                   |             |        |        |
| Data pre-processing             |             |        |        |
| Model design and implementation |             |        |        |
| Model training                  |             |        |        |
| Model testing                   |             |        |        |
| Optimization                    |             |        |        |



|                          |  |  |  |
|--------------------------|--|--|--|
| Model evaluation         |  |  |  |
| Model deployment         |  |  |  |
| Monitoring and inference |  |  |  |

## 2.8 PRIVACY AND CYBERSECURITY REQUIREMENTS

### Cybersecurity requirements

Figure 9:

|                 | Level    | Explanation  |
|-----------------|----------|--|
| Availability    | Low      | every day<br>half a week would be tolerable<br>Longer unavailability                             |
| Integrity       | Critical | accurate with a high level of quality<br>large imbalance<br>underproduction or an overproduction |
| Confidentiality | Critical | personal data (upstream of the concentrator)   |
| Traceability    | High     |  |



Privacy requirements

It is important to note that the billing functions are not considered in our case, this topic being out of scope.

our scenario handles personal data in the data collection phase  
The following data protection requirements and recommendations should be satisfied

Figure 10:

| Requirements   | Explanation                                      |
|--|--|
| Lawfulness, fairness, and transparency <sup>30</sup> | Lawfulness<br><br>Fairness:<br><br>Transparency: |
| Purpose limitation                                   |  |
| Data minimisation                                    |  |

---



|   |  |
|---|--|
| Accuracy  |  |
| Storage limitation  |  |
| Security of personal data (Integrity and Confidentiality) |  |

Figure 11:

| Recommendations   | Explanation |
|---|-------------|
| Database creation   |             |
| Compliance of the training model (i.e. before production) |             |

Figure 12:

| Criteria | Does it match the criteria? | Justification |
|----------|-----------------------------|---------------|
|          |                             |               |
|          |                             |               |
|          |                             |               |

---



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|  |  |  |
|  |  |  |

Figure 13:

|                 | Level    | Explanation |
|-----------------|----------|-------------|
| Availability    | Low      |             |
| Integrity       | Low      |             |
| Confidentiality | Critical |             |
| Traceability    | High     |             |





### 3.1 THREAT CONTEXTUALISATION

electrical production disruption

reputation degradation,

attempts or targeted advertising

phishing

robbery

, separation/divorce

, or job loss

control of their personal data

significant feeling of invasion of privacy, feeling out of  
change in energy consumption billing



**Figure 14:**

### COMPROMISE OF MACHINE LEARNING APPLICATION

#### PROD REP PHISH ROBB

- Poor access right management process
- Weak access control
- Use of vulnerable components

#### DATA DISCLOSURE

##### INV PHISH ROBB

- Poor access right management process
- Weak access control
- Poor data management

#### LACK OF TRANSPARENCY

##### INV CONT

- Absence of an identified data controller
- Lack of justification for the collection of individual personal data collected
- Lack of transparency on the purpose of the use-case

#### NO RESPECT OF STORAGE LIMITATION

##### PHISH ROBB

- Lack of data retention mechanisms
- Lack of data retention policy

### POISONING

#### PROD

- Lack of control poisoning
- Lack of data for increasing robustness to poisoning
- Use of unsafe data or model

#### UNLAWFUL PROCESSING

##### INV PHISH ROBB

- Lack of practical means and justification for obtaining the consents of the electricity consumers concerned

#### DIVERSION OF PURPOSE

##### ROBB

- Lack of controls on data processed
- Lack of controls on users that data is used for (not the purposes defined)
- Lack of controls to ensure the adequacy of the data processed to its current use

#### IMPACTS

- PROD: Electrical production disruption
- REP: Reputation degradation
- PHISH: Phishing attempts, targeted advertising
- ROBB: Diversion of customer holding

### HUMAN ERROR

#### REP INV PHISH ROBB

- Lack of documentation the Electrical forecast system
- Poor access rights management process
- Lack of security by design

#### UNFAIR PROCESSING

##### BILL INV PHI

- Absence of an identified data controller
- Lack of detail on the purposes and justification for their legitimacy
- Lack of traceability of actions and/or modifications made to the assets

#### NO RESPECT OF DATA MINIMIZATION

##### ROBB PHISH INV

- Lack of measures to prevent further data collection
- Lack of necessary data collection

- ROBB: Robbery, separation/divorce, job loss
- PHISH: Significant feeling of invasion of privacy
- INV: Not being in control of personal data

## 3.1.1 Compromise of ML application components

disruption

electrical production

electrical production disruption

reputation degradation

significant feeling of invasion of privacy, phishing attempts, or targeted advertising

robbery, separation/divorce, or job loss

## 3.1.2 Poisoning

data collection



historical consumption data

electrical production disruption.

having collected the data

electrical production disruption

### 3.1.3 Human error

reputation degradation  
privacy, phishing attempts, or targeted advertising  
or job loss

significant feeling of invasion of  
robbery, separation/divorce,

### 3.1.4 Data disclosure

reputation degradation.  
significant feeling of invasion of privacy, phishing attempts,  
targeted advertising, robbery, separation, or divorce and/or job loss.

### 3.1.5 Unlawful Processing

privacy  
significant sense of invasion of

a significant feeling of invasion of privacy

### 3.1.6 Unfair processing

their billing  
unknowingly changing



### 3.1.7 Lack of transparency

not in control of personal data

feeling of being

### 3.1.8 Diversion of purpose

robbery, or separation/divorce, or job loss.

### 3.1.9 No respect of data minimisation

invasion of privacy separation/divorce, job loss in case of data leakage potential  
phishing attempts, targeted advertising, robbery.

### 3.1.10 No respect of storage limitation

targeted advertising, separation/divorce, job loss, phishing attempts,  
robbery.

### 3.1.11 Synthesis of possible impacts and associated threats

Figure 1:

| Impact                                  | Severity | Type | Associated Threats |
|---|----------|------|--------------------|
| Electrical production disruption        | High     |      |                    |
| Reputation degradation                  | High     |      |                    |
| Phishing attempts, targeted advertising | Moderate |      |                    |



|   |          |  |  |
|---|----------|--|--|
| Robbery,<br>Separation/divorce or<br>job loss | High     |  |  |
| Significant feeling of<br>invasion of privacy | Moderate |  |  |
| Not being in control of<br>personal data      | Moderate |  |  |
| Change of consumer<br>billing                 | High     |  |  |

### 3.2 VULNERABILITIES ASSOCIATED TO THREATS AND AFFECTED ASSETS

Figure 2:

| Vulnerabilities  | Threats | Actors | Assets involved |
|--|---------|--------|-----------------|
| Absence of an identified<br>data controller  |         |        |                 |
| Absence of mechanisms<br>to ensure that processing<br>of consumer electricity<br>affected by consent<br>cannot be carried out<br>without consent |         |        |                 |
| Disclosure of sensitive<br>data for ML algorithm<br>training   |         |        |                 |
| Existing biases in the ML<br>model or in the data  |         |        |                 |
| Lack of anonymisation  |         |        |                 |
| Lack of auditability of<br>processing  |         |        |                 |



|  |  |  |  |
|--|--|--|--|
|  |  |  |  |
| Lack of control for poisoning  |  |  |  |
| Lack of control of Data processor <sup>36</sup>  |  |  |  |
| Lack of controls to ensure that data is used only for the purposes defined   |  |  |  |
| Lack of controls to ensure the adequacy of the purpose and its current use   |  |  |  |
| Lack of data deletion mechanisms   |  |  |  |
| Lack of data for increasing robustness to poisoning  |  |  |  |
| Lack of data retention policy  |  |  |  |
| Lack of detail on the purposes and justification for their legitimacy  |  |  |  |
| Lack of documentation  |  |  |  |
| Lack of justification for the collection of individual personal data collected   |  |  |  |
| Lack of legal basis related to users' consent when their detailed consumption data (per hour or half hour) are processed or that legitimate interest related to the daily processing of the data is not properly justified or that no justification is provided at all |  |  |  |



|  |  |  |  |
|--|--|--|--|
| Lack of measures to prevent further data collection  |  |  |  |
| Lack of necessary data selection   |  |  |  |
| Lack of practical means and justification for obtaining the consents of the electricity consumers concerned (those who have a half-hourly view of their electricity consumption) |  |  |  |
| Lack of security by design   |  |  |  |
| Lack of privacy by design  |  |  |  |
| Lack of security process to maintain a good security level of the components of the Electrical forecast system   |  |  |  |

Lack of traceability of actions and/or modifications made to the assets



|  |  |  |  |
|--|--|--|--|
| extracted, and how they are processed.   |  |  |  |
| Lack of verification that the data is adequate, relevant and not excessive for the purpose of estimating electricity consumption |  |  |  |
| Model easy to poison   |  |  |  |
| No detection of poisoned samples in the training dataset   |  |  |  |
| Poor access rights management process  |  |  |  |
| Poor data management   |  |  |  |
| Excessive information available on the model   |  |  |  |
| Unprotected sensitive data on test environments  |  |  |  |
| Use of uncontrolled data   |  |  |  |
| Use of unsafe data or models (e.g., with transfer learning)  |  |  |  |



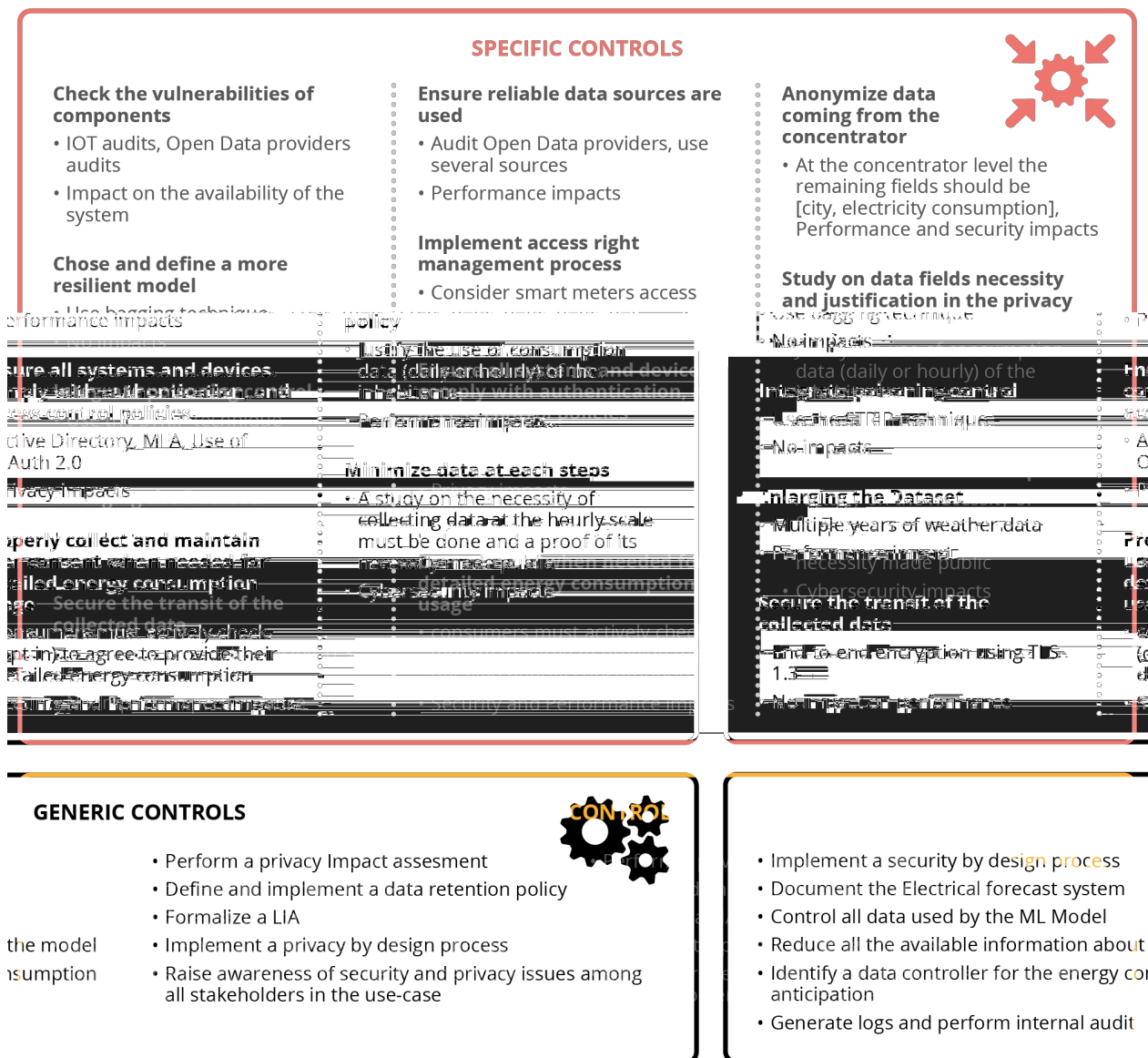


|   |  |  |  |
|---|--|--|--|
| Use of vulnerable components (Among the whole supply chain) |  |  |  |
|---|--|--|--|

Weak access protection

or.2 penael

Figure 17:



**4.1 IMPLEMENT A SECURITY BY DESIGN PROCESS**

| Type | Associated Vulnerabilities | Threats it mitigate   |
|------|----------------------------|---|
|      |                            | <ul style="list-style-type: none"><li>•</li><li>•</li><li>•</li><li>•</li></ul> |

**4.2 DOCUMENT THE ELECTRICAL FORECAST SYSTEM**

| Type | Associated Vulnerabilities | Threats it mitigate   |
|------|----------------------------|---|
|      |                            | <ul style="list-style-type: none"><li>•</li><li>•</li><li>•</li><li>•</li><li>•</li><li>•</li><li>•</li></ul> |



### 4.3 CHECK THE VULNERABILITIES OF THE ML COMPONENTS AND IMPLEMENT PROCESSES TO MAINTAIN THEIR SECURITY LEVELS OVER TIME

| Type | Associated Vulnerabilities                                  | Threats it mitigate   |
|------|---|---|
|      | <ul style="list-style-type: none"><li>•</li><li>•</li></ul> | <ul style="list-style-type: none"><li>•</li><li>•</li></ul> |

### 4.4 CHOOSE AND DEFINE A MORE RESILIENT MODEL DESIGN

| Type | Associated Vulnerabilities | Threats it mitigate |
|------|----------------------------|---------------------|
|      |                            |                     |

---



#### 4.5 INTEGRATE POISONING CONTROL IN THE TRAINING DATASET

| Type | Associated Vulnerabilities                                  | Threats it mitigate |
|------|---|---------------------|
|      | <ul style="list-style-type: none"><li>•</li><li>•</li></ul> |                     |

#### 4.6 ENLARGE THE TRAINING DATASET

| Type | Associated Vulnerabilities | Threats it mitigate |
|------|----------------------------|---------------------|
|      |                            |                     |



#### 4.7 SECURE THE TRANSIT OF THE COLLECTED DATA

| Type | Associated Vulnerabilities | Threats it mitigate |
|------|----------------------------|---------------------|
|      |                            |                     |

#### 4.8 CONTROL ALL DATA USED BY THE ML MODEL

| Type | Associated Vulnerabilities | Threats it mitigate |
|------|----------------------------|---------------------|
|      |                            |                     |

- 
- 



#### 4.9 ENSURE RELIABLE SOURCES ARE USED

| Type | Associated Vulnerabilities | Threats it mitigate |
|------|----------------------------|---------------------|
|      |                            |                     |

#### 4.10 IMPLEMENT ACCESS RIGHT MANAGEMENT PROCESS

| Type | Associated Vulnerabilities | Threats it mitigate   |
|------|----------------------------|---|
|      |                            | <ul style="list-style-type: none"><li>•</li><li>•</li><li>•</li><li>•</li></ul> |



**4.11    ENSURE ALL SYSTEMS AND DEVICES COMPLY WITH AUTHENTICATION, AND ACCESS CONTROL POLICIES**

| Type | Associated Vulnerabilities                                  | Threats it mitigate   |
|------|---|---|
|      | <ul style="list-style-type: none"><li>•</li><li>•</li></ul> | <ul style="list-style-type: none"><li>•</li><li>•</li><li>•</li><li>•</li></ul> |





#### 4.12 REDUCE THE AVAILABLE INFORMATION ABOUT THE MODEL

| Type | Associated Vulnerabilities | Threats it mitigate |
|------|----------------------------|---------------------|
|      |                            |                     |

#### 4.13 IDENTIFY A DATA CONTROLLER FOR THE ENERGY CONSUMPTION ANTICIPATION DATA PROCESSING

| Type | Associated Vulnerabilities | Threats it mitigate   |
|------|----------------------------|---|
|      |                            | <ul style="list-style-type: none"><li>•</li><li>•</li><li>•</li></ul> |



#### 4.14 PROPERLY COLLECT AND MAINTAIN USER CONSENT WHEN NEEDED FOR DETAILED ENERGY CONSUMPTION USAGE

| Type | Associated Vulnerabilities  | Threats it mitigate |
|------|---|---------------------|
|      | <ul style="list-style-type: none"> <li>•</li> <li>•</li> <li>•</li> </ul> |                     |

#### 4.15 ANONYMIZE DATA COMING FROM THE CONCENTRATOR

| Type | Associated Vulnerabilities | Threats it mitigate |
|------|----------------------------|---------------------|
|      |                            |                     |



**4.16    GENERATE LOGS AND PERFORM INTERNAL AUDIT**

| Type | Associated Vulnerabilities                                  | Threats it mitigate   |
|------|---|---|
|      | <ul style="list-style-type: none"><li>•</li><li>•</li></ul> | <ul style="list-style-type: none"><li>•</li><li>•</li><li>•</li><li>•</li><li>•</li><li>•</li></ul> |

**4.17    PERFORM A PRIVACY IMPACT ASSESSMENT**

| Type | Associated Vulnerabilities | Threats it mitigate |
|------|----------------------------|---------------------|
|------|----------------------------|---------------------|



|  |   |  |
|--|---|--|
|  | <ul style="list-style-type: none"> <li>•</li> <li>•</li> <li>•</li> </ul> | <ul style="list-style-type: none"> <li>•</li> <li>•</li> <li>•</li> <li>•</li> </ul> |
|--|---|--|

#### 4.18 DEFINE AND IMPLEMENT A DATA RETENTION POLICY

| Type | Associated Vulnerabilities                                     | Threats it mitigate |
|------|--|---------------------|
|      | <ul style="list-style-type: none"> <li>•</li> <li>•</li> </ul> |                     |

#### 4.19 STUDY ON DATA FIELDS NECESSITY AND JUSTIFICATION IN THE PRIVACY POLICY

| Type | Associated Vulnerabilities                                     | Threats it mitigate   |
|------|--|---|
|      | <ul style="list-style-type: none"> <li>•</li> <li>•</li> </ul> | <ul style="list-style-type: none"> <li>•</li> <li>•</li> <li>•</li> </ul> |



**4.20    FORMALISE A LIA (LEGITIMATE INTEREST ASSESSMENT)**

| Type | Associated Vulnerabilities | Threats it mitigate |
|------|----------------------------|---------------------|
|      |                            |                     |

**4.21    MINIMISE DATA AT EACH STEP OF THE PROCESSING; COLLECT ONLY WHAT IS NEEDED WHEN NEEDED**

| Type | Associated Vulnerabilities                                  | Threats it mitigate |
|------|---|---------------------|
|      | <ul style="list-style-type: none"><li>•</li><li>•</li></ul> |                     |

\_\_\_\_\_



#### 4.22 IMPLEMENT A PRIVACY BY DESIGN PROCESS

| Type | Associated Vulnerabilities | Threats it mitigate   |
|------|----------------------------|---|
|      |                            | <ul style="list-style-type: none"><li>•</li><li>•</li><li>•</li><li>•</li><li>•</li></ul> |

#### 4.23 RAISE AWARENESS OF SECURITY AND PRIVACY ISSUES AMONG ALL STAKEHOLDERS

| Type | Associated Vulnerabilities | Threats it mitigate   |
|------|----------------------------|---|
|      |                            | <ul style="list-style-type: none"><li>•</li><li>•</li><li>•</li><li>•</li><li>•</li><li>•</li><li>•</li></ul> |



## 4.24 SUMMARY

Figure 18:

| Control name and type   | Associated Vulnerabilities | Threat mitigated | Privacy and security requirements addressed |
|---|----------------------------|------------------|---|
| Implement a Security by Design process  |                            |                  |   |
| Document the Electrical forecast system   |                            |                  |   |
| Check the vulnerabilities of the components used and Implement processes to maintain security levels of ML components over time |                            |                  |   |
| Choose and define a more resilient model design   |                            |                  |   |
| Integrate poisoning control in the training dataset   |                            |                  |   |
| Enlarge the training dataset  |                            |                  |   |
| Secure the transit of the collected data  |                            |                  |   |
| Control all data used by the ML Model   |                            |                  |   |
| Ensure reliable sources are used  |                            |                  |   |



|  |  |  |  |
|--|--|--|--|
| Implement access right management process  |  |  |  |
| Ensure all systems and devices comply with authentication, and access control policies       |  |  |  |
| Reduce the available information about the model   |  |  |  |
| Identify a data controller for the energy consumption anticipation data processing           |  |  |  |
| Properly collect and maintain user consent when needed for detailed energy consumption usage |  |  |  |
| Anonymise data coming from the concentrator  |  |  |  |
| Generate Log generation and perform Internal audit process                                   |  |  |  |
| Perform a privacy Impact Assessment  |  |  |  |





|  |  |  |  |
|--|--|--|--|
|  |  |  |  |
| Define and implement a data retention policy                           |  |  |  |
| Study on data fields necessity and justification in the privacy policy |  |  |  |



forecasting demand on electricity grids



## A.1 CYBERSECURITY AND PRIVACY SEVERITY SCALES

| Availability |                    |
|--------------|--------------------|
|              |                    |
| Low          | few days or less   |
| Moderate     | a day or less      |
| High         | half a day or less |
| Critical     | few hours or less  |

| Integrity |   |
|-----------|---|
|           |   |
| Low       | does not need to be identified or corrected         |
| Moderate  | corrected<br>must be identified but not necessarily |
| High      | must be identified and corrected                    |
| Critical  | No degradation                                      |

| Confidentiality |   |
|-----------------|---|
|                 |   |
| Low             | accessed by everyone  |
| Moderate        | restricted to internal staff and trusted<br>partners                                  |
| High            | restricted to employees having an<br>organisation or functional link with the process |
| Critical        | restricted to a very limited number of<br>individuals                                 |



| Traceability |                   |                         |                                  |
|--------------|-------------------|-------------------------|----------------------------------|
|              |                   |                         |                                  |
| Low          | absence of traces |                         | is acceptable                    |
| Moderate     | Actions           |                         | identified                       |
| High         | actions dated     | imputable               | actors identified and            |
| Critical     |                   | actions probative value | legally enforceable time stamped |

## A.2 CYBERSECURITY SCALE OF IMPACT

| Severity <sup>42</sup> |  |
|------------------------|--|
|                        |  |
| 1 - Low                |  |
| 2 - Moderate           |  |
| 3 - High               |  |
| 4 - Critical           |  |

## A.3 PRIVACY SCALE OF IMPACT

| Severity <sup>43</sup> |  |
|------------------------|--|
|                        |  |
| 1 - Low                |  |
| 2 - Moderate           |  |
| 3 - High               |  |
| 4 - Critical           |  |



**A.4 PRIVACY REQUIREMENTS CRITERIA**

| Requirements  | Article |
|---|---------|
| Lawfulness, fairness and transparency                     |         |
| Purpose limitation  |         |
| Data minimisation   |         |
| Accuracy  |         |
| Storage limitation  |         |
| Security of personal data (integrity and confidentiality) |         |

—

| Recommendations  | Details |
|--|---------|
| Database creation  |         |
| Compliance of the training model<br>(i.e. before production) |         |





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