## Customer Service Policy A.1 Customer Privacy Policy

## Notice of Accessing, Collecting, Storing, Using, and Disclosing Energy Usage Information

Sonoma Clean Power Authority (SCPA), its employees, agents, contractors, and affiliates shall maintain the confidentiality of individual customers' names, service addresses, billing addresses, telephone numbers, email addresses, account numbers, and electricity consumption and generation ("customer data"), except where reasonably necessary to conduct SCPA's business or to provide services to customers as required by the California Public Utilities Commission (CPUC or Commission). Examples of reasonably necessary business purposes include but are not limited to when such disclosure is necessary to (a) comply with law, regulation, or court order; (b) enable SCPA to provide service to its customers; (c) collect unpaid bills; (d) obtain and provide credit reporting information; (e) resolve customer disputes or inquiries; (f) communicate about demand response, energy efficiency, energy management, and conservation programs, or (g) in situation of imminent threat to life or property. SCPA shall not, under any circumstance, disclose customer information for third-party telemarketing, e-mail, or direct mail solicitation. Aggregated data that cannot be traced to specific customers may be released at SCPA's discretion.

Customer data, including Advance Metering Infrastructure data, is collected via PG&E's metering systems. SCPA may disclose customer data to third parties for the primary purposes of providing a bill for electrical power, providing for system, grid, or operational needs, providing services as required by state or federal law or as specifically authorized by an order of Commission, or for planning, implementing, or evaluating demand response, energy management, or energy efficiency programs<sup>1</sup>. SCPA's contractors and vendors are contractually required to agree to only use customer data for the contracted purpose to protect customer data under the same standards as SCPA. SCPA maintains customer-specific energy usage and billing information for only as long as is reasonably necessary, typically not more than five years, unless otherwise necessary by law or regulation.

The original effective date of this policy is November 7, 2013; this amended version will go into effect on the date it is approved by SCPA's Board of Directors. Notice of this policy is provided annually to customers via an on-bill message to guide customers to the most updated version on Sonoma Clean Power's website at sonomacleanpower.org/privacy-policy. Any changes to this policy between notification periods will be communicated through Sonoma Clean Power's website. Previous versions of this policy can be requested via email at info@sonnomacleanpower.org or by mailed request to Sonoma Clean Power, Attention: Director of Customer Service, PO Box 1030, Santa Rosa, CA 95402.

Adopted: November 7, 2013

**Amended**: May 7, 2015 and October 22, 2015, October 1, 2020

<sup>&</sup>lt;sup>1</sup> CPUC Decision 12-08-045, Attachment B, 1(c).

Customers having any questions or concerns regarding the collection, storage, use, or distribution of customer information, or who wish to view, inquire about, or dispute any customer information held by SCPA or limit the collection, use, or disclosure of such information, may contact Erica Torgerson, Director of Customer Service, by phone at (707) 791-1341, via email at etorgerson@sonomacleanpower.org, or by mail at PO Box 1030, Santa Rosa, CA 95402.

Adopted: November 7, 2013

**Amended**: May 7, 2015 and October 22, 2015, October 1, 2020