



Clean Power Alliance Administrative Policies and Procedures

Policy Title	CPA Advanced Metering Infrastructure (AMI) Data Security and Privacy Policy		
Policy Number	CPA2018-04	Effective Date:	06/07/2018
Reference:	CPUC Decision 12-08-045		

1.0 Definition of Terms

1.1 California Public Utilities Commission (CPUC)

A regulatory agency that regulates privately owned public utilities in the state of California, including electric power, telecommunications, natural gas and water companies.

1.2 Policy

- A. CPA shall implement reasonable administrative, technical, and physical safeguards to protect covered information from unauthorized access, destruction, use, modification, or disclosure.
- B. CPA and all third parties shall provide reasonable training to all employees and contractors who use, store, or process covered information.
- C. CPA shall collect, store, use, and disclose only as much covered information as is reasonably necessary or as authorized by the Commission to accomplish a specific primary purpose.

1.3 Procedure

1. Transparency and Notification

- A. CPA shall provide customers with meaningful, clear, accurate, specific, and comprehensive notice regarding the accessing, collection, storage, use, and disclosure of AMI data: provided, however, that CPA is using AMI data solely for a primary purpose on behalf of and under contract with utilities it is not required to provide notice separate from that provided by the utility.
- B. CPA shall provide written notice when confirming a new customer account an at least once a year. The notice shall inform customers how they may obtain a copy

of CPA's notice regarding the accessing, collection, storage, use, and disclosure of AMI data and shall provide a conspicuous link to the notice on the home page of their website and include a link to their notice in all electronic correspondence to customers.

1. The notice shall be labeled Notice of Accessing, Collecting, Storing, Using and Disclosing Energy Usage Information and shall be written in easily understandable language and be no longer than is necessary to convey the requisite information.
 2. The notice and the posted privacy policy shall state clearly the identity of CPA, the effective date of the notice or posted privacy policy, CPA's process for altering the notice or posted privacy policy including how the customer will be informed of any alterations and where prior versions will be made available to customers, and the title and contact information including email address, postal address, and telephone number of an official at CPA who can assist the customer with privacy questions, concerns, or complaints regarding the collection, storage, use, or distribution of covered information.
 3. The notice shall provide an explicit description of each category of covered information collected, used, stored, or disclosed, and for each category of covered information, the reasonably specific purposes for which it will be collected, stored, used, or disclosed, each category of covered information that is disclosed to third parties, and, for each such category, a description of the means by which customers may view, inquire about, or dispute their covered information, and the means, if any, by which customers may limit the collection, use, storage, or disclosure of covered information and the consequences to customers if they exercise such limits.
- C. CPA shall provide to customers upon request convenient and secure access to their covered information in an easily readable format that is at a level no less detailed than that at which the covered entity discloses the data to third parties.

2. Use, Disclosure, and Customer Authorization

- A. CPA may disclose covered information without customer consent to a third party acting under contract with the Commission for the purpose of providing services authorized pursuant to an order or resolution of the Commission or to the governmental entity for the purpose of providing energy efficiency or energy efficiency evaluation services pursuant to an order or resolution of the Commission.
- B. CPA may disclose covered information to a third party without customer consent when explicitly ordered to do so by the Commission, or for a primary purpose being carried out under contract with an on behalf of CPA provided that the covered entity disclosing the data shall, by contract, require the third party to agree to access,

collect, store, use, and disclose the covered information under policies, practices, and notification requirements no less protective than those under which the covered entity itself operates.

- C. Any entity that receives covered information derived initially from CPA may disclose such covered information to another entity without customer consent for a primary purpose, provided that the entity disclosing the covered information shall, by contract, require the entity receiving the covered information to use the covered information only for such primary purpose and to agree to store, use, and disclose the covered information under policies, practices, and notification requirements no less protective than those under which the covered entity from which the covered information was initially derived operates.
- D. When CPA discloses covered information to a third party under this subsection it shall specify by contract, unless otherwise ordered by the Commission, that it shall be considered a material breach if the third party engages in a pattern or practice of accessing, storing, using, or disclosing the covered information in violation of the third party's contractual obligations to handle the covered information under policies no less protective than those under which the covered entity from which the covered information initially derived operates.
- E. If CPA finds that a third party contractor to which it disclosed covered information is engaged in a pattern or practice of accessing, storing, using, or disclosing covered information in violation of the third party's contractual obligations related to handling covered information, CPA shall promptly cease disclosing covered information to such third party.
- F. Separate authorization by each customer must be obtained for all disclosures of covered information except as otherwise provided for herein.
- G. CPA shall permit customers to cancel authorization for any secondary purpose of their covered information by the same mechanism initially used to grant authorization.
- H. CPA shall permit the use of aggregated usage data that is removed of all personally-identifiable information to be used for analysis, reporting, or program management provided that the release of that data does not disclose or reveal specific customer information because of the size of the group, rate classification, or nature of the information.