## Orange County Power Authority Policy Number 003: Customer Information Confidentiality Policy

Orange County Power Authority (Authority), its employees, agents, contractors, and affiliates shall maintain the confidentiality of customers' names, service addresses, billing addresses, telephone numbers, email addresses, account numbers, and electricity consumption, except where reasonably necessary to conduct the Authority's business or to provide services to customers pursuant to the "Rules Regarding Privacy and Security Protections for Energy Usage Data" issued by the California Public Utilities Commission (CPUC).

Examples of reasonably necessary business purposes include, but are not limited to, when such disclosure is necessary (a) to comply with law, regulation, or court order; (b) to enable the Authority to provide service to its customers; (c) to collect unpaid bills; (d) to obtain and provide credit reporting information; (e) to resolve customer disputes or inquiries; (f) to communicate about demand response, energy efficiency, energy management, and conservation programs; or (g) in a situation of imminent threat to life or property. The Authority 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 the Authority's discretion.

Customer data, including individual customer names, addresses, and electric energy usage data, is collected via Southern California Edison (SCE's) metering systems. The Authority may share customer data with contractors and vendors for purposes of providing services and operating programs. Contractors and vendors are required to agree to only use customer data for program operational purposes and protect it under the same standards as the Authority. The Authority maintains customer-specific energy usage and billing information for only as long as is reasonably necessary, typically not more than five years unless otherwise required by law or regulation.

Notice of this policy will be provided annually to customers via an on-bill message guiding customers to the most updated version on the Authority's website at www.ocpower.org. Any changes to this Policy between notification periods will be communicated on the Authority's website.

Customers that have 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 the Authority or limit the collection, use, or disclosure of such information, may contact the Authority's Chief Executive Officer or Chief Operating Officer by e-mail to info@ocpower.org.