

**Clean Energy Alliance  
Administrative Policy**

SUBJECT:		EFFECTIVE DATE:	
<b>Privacy and Customer Confidentiality Policy</b>		<b>February 20, 2020</b>	
POLICY #:	SUPERSEDES	STAFF CONTACT	# OF PAGES:
<b>CEA-03</b>	<b>N/A</b>		<b>3</b>

- 1.0 Purpose:  
To establish a Privacy and Customer Confidentiality Policy for Clean Energy Alliance (CEA).
- 2.0 Organizations affected:  
Clean Energy Alliance  
Clean Energy Alliance Board Members  
All Clean Energy Alliance Member Agencies
- 3.0 References:  
CPUC Decision 12-08-045
- 4.0 Definitions:
- 4.1 Aggregate Data – Aggregated customer confidential information must be made up of at least 15 customers and a single customer’s load must be less than 15% of an assigned category.
- 4.2 Confidential Information – has a meaning in accordance with CPUC Decision 12-08-045, which extends privacy protections to customers of community choice aggregation programs.
- 4.3 Customer Data - includes individual names, addresses and electricity energy usage data of customers that is collected via San Diego Gas & Electric’s (SDGE) metering systems.
- 5.0 Policy – Notice of Accessing, Collecting, Storing, Using and Disclosing Energy Usage Information:
- 5.1 CEA, its employees, agents, contractors, and affiliates shall maintain the confidentiality of individual customers, including name(s), service address(es), billing address(es), telephone number(s), email address(es), account number(s), social security number(s), taxpayer ID number(s), and electricity consumption

information; except as reasonably necessary to conduct CEA's business operations or to provide services to customers as required by the CPUC.

- 5.2 Examples circumstances constituting reasonably necessary disclosures, sharing, or transmitting of confidential information include, but are not limited to, when necessary to:
- a) Comply with any law, regulation, or court order;
  - b) Enable CEA to provide services 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, or to prevent or resolve service interruptions.
- 5.3 CEA shall not, under any circumstances, disclose customer confidential information for third-party telemarketing, email, or direct mail solicitation purposes. Aggregated data that cannot be traced to specific customers may be released at CEA's discretion.
- 5.4 Customer data, including individual customer names, addresses and electricity energy usage data, is collected via San Diego Gas & Electric's (SDGE) metering systems. CEA 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 CEA. CEA retains customer-specific energy usage and billing information for only as long as is reasonably necessary, typically not more than five (5) years unless otherwise required by law or regulation.
- 5.5 Notice of this policy will be provided when confirming a new customer account, and annually to customers via an on-bill message to guide customers to the most updated version on CEA's website at [www.TheCleanEnergyAlliance.org](http://www.TheCleanEnergyAlliance.org). Any changes to this policy between notification periods will be communicated through CEA's website. Previous versions of this policy can be requested via email at [CEO@TheCleanEnergyAlliance.org](mailto:CEO@TheCleanEnergyAlliance.org) or by mailed request to Clean Energy Alliance, 1200 S. Carlsbad Village Dr, Carlsbad, CA. 92008.
- 5.6 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 CEA or limit the collection, use or disclosure of such information may contact the Chief Executive Officer of Clean

Energy Alliance via email at CEO@TheCleanEnergyAlliance.org or by mail at Clean Energy Alliance, 1200 S. Carlsbad Village Dr, Carlsbad, CA. 92008.

- 5.7 Employees of CEA shall be provided a copy of this policy, and it shall be construed and implemented by such employees consistent with Policy CEA-02 - Protection of Confidential Information policy to protect confidential customer information.

Barbara Boswell

Barbara Boswell  
Interim Chief Executive Officer

2/23/20

Date