

**Clean Energy Alliance
Administrative Policy**

SUBJECT: Privacy and Customer Confidentiality Policy		EFFECTIVE DATE: February 20, 2020
POLICY #: CEA-03	AMENDED: September 25, 2025	# OF PAGES: 3

- 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 or as authorized by the California Public Utilities Commission to accomplish a specific primary purpose identified in the notice required under this policy or for a specific secondary purpose authorized by the customer, typically not more than five (5) years and not less than two (2) years, unless otherwise required by law or regulation.
- 5.5 Notice of this policy will be provided when confirming a new customer account, if a customer signs up for SMS alerts 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. 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 clerk@TheCleanEnergyAlliance.org or by mailed request to Clean Energy Alliance, 5857 Owens Ave, Suite 334, 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, 5857 Owens Ave, Suite 300, 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.

6.0 Amendments:

6.1 This policy may be amended or modified from time to time by the Chief Executive Officer, in consultation with CEA's General Counsel.

6.2 The Chief Executive Officer shall report any and all such amendments or modifications to the Board of Directors for CEA at its next regular meeting.

Signed by:


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Gregory Wade
Chief Executive Officer

9/26/2025

Date