



Customer Data Confidentiality Policy

San Diego Community Power (SDCP), its employees, agents, contractors, and affiliates will maintain the confidentiality of customer information, which may include, but not be limited to, individual customers' names, service addresses, billing addresses, telephone numbers, e-mail addresses, account numbers, social security numbers, taxpayer identification numbers, and electricity consumption information except where reasonably necessary to conduct SDCP's business or to provide services to customers as required by the California Public Utilities Commission (CPUC).

Examples of reasonably necessary business purposes include but are not limited to when such disclosure is necessary to (a) comply with an applicable law, regulation or court order; (b) enable SDCP 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 situations of imminent threat to life or property, or to prevent or resolve service interruptions. SDCP will not disclose customer information for telemarketing, e-mail, or direct mail solicitation. Aggregate data that cannot be traced to specific customers may be released at SDCP's discretion.

Customer information, including individual customer names, addresses, and electric energy usage data, is collected via SDG&E's metering systems. For the circumstances constituting reasonably necessary disclosures cited herein, SDCP may share customer information with contractors and vendors for purposes of providing services and operating programs. Contractors and vendors are required to agree to only use customer information for program operational purposes and protect it under the same standards as SDCP. SDCP 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.

SDCP will handle customer energy usage information in a manner that is fully compliant with applicable law, which includes, but is not limited to, the California Public Utility Commission's required privacy protections for customers of Community Choice Aggregators defined in Decision 12-08-045, as may be amended or replaced from time to time.

SDCP will provide notices related to this policy as required by applicable law, including Decision 12-08-045. Such notice may include, but not be limited to: (a) providing notice in writing when confirming a new customer account; (b) informing customers at least once annually how they may obtain a copy of the notice, inclusive of any updates or revisions to this policy; and (c) providing links to the notice on SDCP's website at www.sdcommunitypower.org and in electronic communications with customers. Any changes to this policy between notification periods will be communicated through SDCP's website. Previous versions of this policy may be requested via email at customerservice@sdcommunitypower.org.

Upon request, SDCP will provide customers convenient and secure access to customer information in an easily readable format that is no less detailed than the data SDCP discloses to authorized third parties.

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 SDCP or request to limit the collection, use or disclosure of such information, may contact us at customerservice@sdcommunitypower.org.

Employees of SDCP and covered entities doing business with SDCP shall be provided a copy of this policy, and it shall be construed and implemented consistent with any other policies relating to the protection of confidential information.

To ensure timely compliance with legal developments and/or changes in SDCP's practices or procedures, SDCP's Chief Executive Officer, in consultation with SDCP's General Counsel, is authorized to amend this policy without further approval of the Board of Directors.