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Thomas L. Mumaw
Sr. Regulatory Attorney
Pinnacle West Capital Corp., Law Department

Mall Station 8695
400 North 5th Street
Phoenix, AZ 85004
Tel 602-250-2052
Email Thomas.Mumaw@pinnaclewest.com

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Phoenix, Arizona 85007

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RE: Notice of Staff's Request for Informal Comment
Docket No. RU-00000A-14-0014
Handling of Private Customer Information by Utilities

Privacy and confidentiality of customer information is a priority for Arizona Public Service Company (APS or the Company). The Company recognizes the customer's right to privacy and confidentiality and has always protected the customer-specific information obtained from its customers as a result of providing electric services and products. APS believes that the data privacy rules, regulations, and statutes currently in place have been and are effective in preventing unauthorized disclosure of customer information by the utilities under the Arizona Corporation Commission's (Commission) jurisdiction. Commission regulations, approved rate and service schedules, state statutes, federal regulations, and codes of conduct all contain strict and specific language which protects the privacy of customer information.¹ Each of these rules, regulations, and statutes judiciously control disclosure of confidential customer information by the Company.

APS consistently complies with these policies and requirements. Each Company employee is required to complete an annual training course that includes state and federal compliance training. This training specifically identifies customer information as confidential and restricts the disclosure of this information to third parties, and all employees are expected to follow these rules in the daily course of business. Current utility customer information privacy practices have been very effective to date in Arizona.

The Company appreciates the opportunity to provide comments on the Handling of Private Customer Information by Utilities Draft Rules (Draft Rules) filed by Staff on June 24, 2014 in the above-mentioned Commission docket. The Company is providing comments aimed at clarifying the language contained in the Draft Rules to allow for clearer and more consistent

¹ These rules, regulations, and statutes are found at A.A.C. R14-2-203(A)(2); APS's Service Schedule 1, Terms and Conditions for Standard Offer and Direct Access Services, Paragraph 2.9; A.R.S. §44-1376 through §44-1376.05; 15 U.S.C. 1681 et. seq.; and APS's Code of Conduct for the Arizona Corporation Commission, Part Two, Section III, Paragraph A.

interpretation, and to lessen the administrative burden and expected cost of complying with the proposed customer information opt-in procedure. Additionally, a redlined version of the Draft Rules addressing the Company's comments is attached.

APS is concerned that the Draft Rules unnecessarily and inappropriately restrict the ability of the Company to conduct its day-to-day business. While it is important that customer information remains private and is not disclosed to unauthorized third parties without customer consent, it is also important to allow the utility to educate and inform the customer about available programs and services. Customers cannot exercise choice without an awareness of all programs and services available for which the customer may qualify. APS routinely provides its customers with information on Commission-approved programs and services to drive increased participation and to provide choices. The majority of these programs and services are developed for a specific segment of the Company's customer population (such as residential services, low-income services, or business-specific services), and the Draft Rules appear to severely limit APS's ability to communicate the benefits of these programs.

For example, the Company's Commission-approved "Equalizer Billing," a customer-friendly (and often requested) program in which a customer pays averaged equal monthly payments to assist in budgeting household energy expense, is available only to residential customers who do not have any late payments or returned checks. Without the ability to specifically contact eligible residential customers based on that participation criteria, the Company would be required to provide information to all customers (including business customers), whether eligible or not – creating frustration and dissatisfaction when a customer wants to participate but is not eligible.

Additionally, the Draft Rules appear to require a significant change in how the Company interacts with governmental agencies such as police departments, health and social service agencies, and other agencies of this type. Today, privacy requirements in rules and statutes allow the Company to provide information requested by these agencies at the time of the request and, at least in the case of police departments, do not require the Company to ask or disclose how that information will be used. The Draft Rules may require a subpoena prior to releasing any information – a restriction which may prevent governmental agencies from performing critical functions. Ironically, the Arizona Department of Health Services is currently conducting tests on the Company's automated meters at the Commission's request, a function that would not be possible under the Draft Rules without prior customer consent through an opt-in request. The Draft Rules would also require the Company to keep records of law enforcement requests, and provide notice of those requests to the Commission and the customer. This requirement would not only be burdensome to administer, but would likely inundate the Commission with disclosure information, as APS receives hundreds of requests of this nature every month.

The Draft Rules also appear to limit the ability of the utility to use customer information for its own legitimate business purposes. For example, individual consumption data is used by the Company for purposes ranging from billing customers to identifying energy theft to calculating line extension advances. Individual customer information is used to estimate bills, identify malfunctioning meters, and validate consumption data. The Company uses individual, non-aggregated data to size neighborhood transformers and to conduct specific system planning

activities. Each of these tasks (and others like them) is necessary to provide quality customer service, bill and collect amounts owed, and meet the Commission's rules and requirements. As has been shown in the Commission's current Innovations and Technological Advances workshops, one of the major advantages of modern grid technologies is in the utilization of electronically gathered data to conduct activities such as pinpointing outages on the distribution system, as discrete as an individual transformer, in order to quickly restore power to customers. APS believes the Draft Rules could be interpreted to permit most, if not all, of these activities. However, the Draft Rules are not clear – and with regard to customer service, clarity is imperative. Restrictions on the utility's use of customer data, especially during a time when significant emerging technology is being adopted by the utility to the benefit of the customer, could render many of these advances ineffective.

Because privacy laws and regulations should focus on the disclosure of customer information rather than the use of that information by the utility, APS has included recommended language throughout its redlined Draft Rules that will allow utilities to continue to apply normal industry practices for legitimate business purposes.

Another overall concern of the Company is that the opt-in process as set forth in the Draft Rules is a significant departure from today's customer information disclosure rules and regulations, and will be costly and cumbersome for utilities to implement. And, with a deluge of requests, notices, and reminders, customers may become increasingly likely to stop paying attention to – if not become outright annoyed at – communications from their utilities, decreasing the efficacy of each notice and the likelihood that customers will be aware of the data choice the customer has made. The Company recommends that several of the procedures be revised to streamline the process and reduce the cost of implementation as much as possible; these recommendations are included in the redlined version of the Draft Rules attached to these comments.

One of the provisions of the opt-in procedure appears to allow customers to selectively opt-in; that is, to choose which third-party agents or associates the utility may disclose the customer information to. This provision, if implemented, would be extremely costly, would add significant administrative burdens to a process already cumbersome, and is simply not necessary. In the interest of timely and cost-effective implementation, APS proposes that the customer who chooses to opt-in has chosen to allow the utility to provide customer information to any agent or associate collaborating with the Company to provide a utility product or service.

Another provision of the procedure that is prohibitively burdensome is the provision requiring the utility to name in the disclosure agreement each and every agent or associate the Company contracts with to provide utility service or products. While this requirement may appear to be reasonable, the Company's contractors frequently change, and requiring the utility to execute a new disclosure agreement with the customer each time a contractor change is made is excessive and unnecessary. APS often changes or adds contractors to enhance the customer experience, for cost-effectiveness, and for other prudent business reasons. Instead, APS recommends the disclosure agreement include the type of service or product the customer information will be used for (i.e., energy efficiency programs, outage notifications, etc.). In its proposed redline, APS has also recognized the fact that many contractors use sub-contractors to

provide services, so the contractual confidentiality provisions have been extended to include sub-contractors as well.

Even with these proposed revisions to the Draft Rules, APS estimates that development of the software required to implement the opt-in procedure will alone cost approximately \$4 million. This cost does not include the ongoing costs of administering the procedure such as continuing call center training, development of in-house opt-in policies and procedures to ensure compliance, mailing cost, and software maintenance. Additionally, APS estimates that implementation of the procedure will require approximately 18 months.

With regard to the portion of the Draft Rules addressing wireless security measures, APS employs technology to protect the security of customer usage data, and continually upgrades security protocols to align with industry standards and applicable best practices. Today, all information wirelessly transmitted to the Company from its automated meters is encrypted and/or password protected. It is likely, however, that not all emerging security practices or technologies developed for the industry will be applicable or cost-effective for APS and its customers. For example, if a new costly technology is accepted as effective but the technology does not provide any higher security than the protocols in use at APS, the Company should not burden its customers with that additional cost. Revisions to reflect this concern are included in the redlined Draft Rules attached to these comments.

Finally, the Draft Rules are silent on the retention of documentation required throughout the opt-in procedure. APS believes specific retention requirements are necessary in order to effectively implement this far-reaching procedure, and has recommended an additional paragraph addressing documentation retention.

APS looks forward to participating with Staff and the Commission in discussions regarding these Draft Rules and would be happy to answer any questions the Company's comments may raise.

Sincerely,



Thomas L. Mumaw

TLM/bgs

ARTICLE 22. PRIVATE CUSTOMER INFORMATION

R14-2-2201. Definitions.

In this Article, unless otherwise specified:

1. "Affiliate" means, with respect to a utility, any other entity directly or indirectly controlling, controlled by, or under common control with the utility, where the control includes the power to direct management policies or practices, whether through ownership of voting securities, by contract, or otherwise.
2. "Agent" means a person who is acting under and in accordance with authority granted by a utility and in furtherance of the utility's objectives, but who is not a utility employee.
3. "Aggregate information" means collective data that relates to a group or category of services or customers, from which ~~private customer~~ personally identifying information has been removed such that a specific customer's identity cannot be ascertained.

Revision for internal rule consistency.

4. "Associate" means a person, separate from a utility and neither an affiliate nor an agent of the utility, with which the utility has a business relationship through contract or otherwise, and includes a person such as an independent contractor or joint venture partner.
5. "Customer" means a person currently receiving service from a utility.
6. "Disclose" means to release, transfer, permit access to, or divulge in any other manner.
7. "Disclosure" means the act or omission through which one discloses.
8. "Documentation" means supportive information recorded in written, photographic, electronic, or other ~~permanent~~ fixed form.

Revision for clarity of language and to conform with industry practice.

9. "Opt-in approval" means customer consent to use or disclose the customer's private customer information, obtained as required in this Article.
10. "Person" means an individual or a partnership, corporation, governmental agency, or other organization operating as a single entity.
11. "Personally identifying information" means any of the following pertaining to a specific customer.

- a. ~~a.~~ Name,
- b. ~~b.~~ Social Security Number,
- bc. ~~c.~~ Address,
- ed. ~~d.~~ Telephone number,
- de. ~~e.~~ E-mail address,
- ef. ~~f.~~ Account number,
- f.g. ~~g.~~ Date of birth, or
- gh. ~~h.~~ Other information that could be used to determine the identity of or to make contact with the customer.

Revision to include significant personal information.

12. "Private customer information" means any personally identifying information combined with any ~~of~~ the following pertaining to a specific customer and available to the utility serving that customer solely by virtue of the utility-customer relationship:

- a. ~~a.~~ Personally identifying information;
- ba. ~~b.~~ Information regarding identifying the type, quantity, and technical configuration of any utility service or product to which the customer subscribes;
- be. ~~c.~~ Information regarding identifying the time of use, amount of use, and destination for any utility service or product to which the customer subscribes; and
- cd. ~~d.~~ Information regarding identifying any specific type of device, equipment, or appliance that a customer uses and any inference drawn as a result of such use.

Revisions to clarify that kWh usage in itself is not private without accompanying identifying information.

13. "Subsidiary" means an affiliate for which the utility or the utility's parent owns or controls at least a majority of the shares.
14. "Third Party" means a person who is not:
- a. The customer;
 - b. The utility providing service to the customer;
 - c. An agent or associate of the utility obtaining private customer information only for purposes of enabling the utility to safely and effectively provide the customer with the utility service and products to which the customer has subscribed; or
 - d. A person to whom the customer has authorized disclosure of private customer information.
15. "Utility" means a public service corporation, as defined in Article 15, § 2 of the Arizona Constitution, providing electric, gas, water, or sewer service within Arizona.

R14-2-21022202. Applicability.

Revision for internal rule consistency.

This Article applies to each utility as defined in R14-2-2201.

R14-2-21032203. Prohibition on Use and Disclosure of Private Customer Information.

Revision for internal rule consistency.

- A. Except as provided in this Article, a utility shall not use or disclose a customer's private customer information.
- B. Notwithstanding subsection (A), a utility may:
1. Use a customer's private customer information as necessary to enable the utility directly or indirectly to provide or offer the customer with any utility service, program or and any utility product requested by the customer, or to which the customer has subscribed, or in which the customer may have an interest;

Revisions to clarify the utility is allowed to provide customers information on services it provides.

2. Disclose a customer's private customer information to an agent, affiliate, or associate for use, as necessary to enable the utility directly or indirectly to provide or offer the customer with any utility service, program or and any utility product requested by the customer, or to which the customer has subscribed, or in which the customer may have an interest; and

Revisions to clarify the utility is allowed to provide customers information on services it provides.

3. Disclose a customer's private customer information to a third party, if the customer has made an affirmative written request to the utility for such disclosure to be made. A customer's oral request that is recorded and retained by the utility in accordance with R14-2-2214 shall satisfy the written request requirement.

Revision to allow customers to opt-in through the utility's call center.

- C. Before a utility discloses a customer's private customer information to an agent, affiliate, or associate for a purpose described in subsection (B)(1) or (2), the utility shall ensure that the agent, affiliate, or associate executes an confidentiality agreement that includes confidentiality provisions that:

Revision to allow confidentiality provisions to reside within the contractor master agreement for simplicity and to conform with industry practice.

1. Requires the agent, affiliate, or associate receiving the customer's private customer information to use the information only as described in subsection (B)(1) or (2);
2. Requires the agent, affiliate, or associate not to disclose the customer's private customer information, except to subcontractors that are subject to contractual confidentiality requirements as set forth in this Section; and

Revision to allow contractors to use subcontractors if necessary and to conform with industry practice.

3. Is executed either in writing or electronically.

RI4-2-2204. Opt In Approval Required Before Use or Disclosure of Private Customer Information for Non-Utility Purposes.

Except as provided in R14-2-2209, a utility shall obtain a customer's opt-in approval, as provided in this Article, before the utility:

1. Uses the customer's private customer information for any purpose other than as described in R14-2-2203(B);
2. Discloses the customer's private customer information to an agent, affiliate, or associate for any purpose other than as described in R14-2-2203(B).; or
3. Discloses the customer's private customer information to any third party for any purpose other than as requested under R14-2-2203(B)(3).

RI4-2-2205. Obtaining Opt-In Approval; Restrictions.

- A. A utility that desires to use or disclose a customer's private customer information, as set forth in R14-2-2204, shall first obtain the customer's opt-in approval as provided in this Section.
- B. A utility that desires to obtain a customer's opt-in approval for use or disclosure of private customer information shall send to the customer an opt-in notice that:
 1. Identifies each type of service provided by an agent, affiliate, associate, or third party to whom the utility desires to disclose the customer's private customer information;
 2. Identifies with specificity each purpose for which the utility desires to disclose the customer's private customer information to each type of service provided by an agent, affiliate, associate, or third party; and each purpose for which the utility desires to use the customer's private customer information.

Revisions to reduce burden and cost of compliance.

3. With respect to private customer information obtained from a meter or other utility equipment installed on the customer's premises, the use or disclosure of which is not necessary to provide utility service to the customer authorized under R14-2-2203, specifically identifies the manner in which the private customer information is to be used by the utility, or by an agent, affiliate, associate or third party;

Revision for internal rule consistency.

4. Includes the definition of private customer information from R14-2-2201;
5. Informs the customer of the customer's right to deny the utility's request to use the customer's private customer information for a purpose other than as described in R14-2-2203(B) or R14-2-2209;
6. Informs the customer of the customer's right to deny the utility's request to disclose the customer's private customer information to any agent, affiliate, associate, or third party for any purpose other than as described in R14-2-2203(B) or R-14-2-2209;
7. ~~Informs the customer of the customer's right to impose limitations on the use and disclosure of the customer's private customer information, rather than granting the full opt-in approval requested by the utility, except as set forth in R14-2-2203(B);~~
8. ~~Informs the customer of the utility's duty to comply with any limitations the customer imposes on the utility's use and disclosure of the customer's private customer information;~~

Revisions to reduce burden and cost of compliance.

79. Informs the customer of the requirements set forth in R14-2-2203;
810. Informs the customer that the customer's denial of opt-in approval will not affect the utility's provision to the customer of any utility service or any utility product requested by the customer or to which the customer has subscribed;
119. Informs the customer of the customer's right, at any time, to revoke or limit any opt-in approval previously granted by the customer;

Revision to reduce burden and cost of compliance.

102. Includes a phone number that the customer may call with any questions concerning the opt-in notice;
113. Is clearly legible, in 12-point or larger print;
124. Is available to read on the utility's website in at least English and Spanish

versions;

- 135. Is provided to the customer in both English and Spanish versions, unless the customer has previously expressed a preferred language, in which case the notice may be written in that language alone;
- 146. If mailed to the customer, is mailed separately from any billing information, inducement, advertising, or promotional information, unless the opt-in notice is included as an insert in the customer's monthly bill sent within an envelope clearly marked in bold type "contains important privacy information";
- 157. If sent to the customer electronically, is e-mailed separately from any billing information, inducement, advertising, or promotional information;
- 168. Includes instructions for how the customer must respond to provide opt-in approval;
- 179. Informs the customer's opt-in approval shall be automatically renewed and remain in effect until the customer revokes, ~~modifies,~~ or ~~limits~~ the opt-in approval; and

Revision to reduce burden and cost of compliance.

- 1820. Informs the customer of a toll-free telephone number, and any other available method, through which the customer can notify the utility if the utility has made an error regarding the customer's opt-in approval status or the customer desire to revoke ~~or limit~~ the customer's opt-in approval.

Revision to reduce burden and cost of compliance.

- C. If a customer does not respond to an opt-in notice, the customer's non-response shall be deemed a denial of the requested opt-in approval.
- D. A customer's opt-in approval authorizes a utility to use the customer's private customer information only for the purposes set forth in the opt-in notice, ~~subject to any additional limitations made by the customer,~~ and to disclose the customer's private customer information only to the persons identified in the opt-in notice, ~~subject to any additional limitations made by the customer.~~

Revision to reduce burden and cost of compliance.

- E. An opt-in notice that does not comply with the provisions of subsection (B) cannot result in effective opt-in approval from a customer.
- F. Before a utility discloses a customer's private customer information to an agent, affiliate, associate, or third party as authorized by the customer's opt-in approval, the utility shall require the agent, affiliate, associate, or third party to execute a confidentiality agreement that:

1. Requires the agent, affiliate, associate, or third party receiving the customer's private customer information to use the private customer information only as authorized in the customer's opt-in approval;
2. Requires the agent, affiliate, associate, or third party not to disclose the customer's private customer information except to subcontractors that are subject to contractual confidentiality requirements set forth in Section R14-2-2203(C); and

Revision to allow contractors to use subcontractors if necessary and to conform with industry practice.

3. Is executed either in writing or electronically.

R14-2-2206. Confirmation and Verification of Opt-In Approval.

- A. Within 10 days after receiving a customer's opt-in approval, a utility shall provide the customer with written confirmation:
 1. Sent to the customer by mail or electronic mail with return receipt requested to ensure that the customer received the confirmation of opt-in approval;
 2. Mailed or e-mailed separately from any other communication from the utility;
 3. Explaining clearly the effect of the customer's opt-in approval choices, including ~~a list of the~~ the type of service provided by the agents, affiliates, associates, or third parties for which disclosure has been authorized and a list of the purposes for which use or disclosure has been authorized; and
 4. Informing the customer of a toll-free telephone number, and any other available method, through which the customer can notify the utility if the utility has made an error regarding the customer's opt-in approval status or the customer desires to revoke ~~or limit~~ the customer's opt-in approval.

Revisions to reduce burden and cost of compliance.

- B. Before a utility uses, or discloses private customer information as authorized by a customer's opt-in approval, the utility shall verify that the name, service address, and account number for the customer as provided in the opt-in approval matches the utility record for the customer's account
- C. A utility shall retain, maintain, and provide to the customer or the Commission upon request the following documentation concerning each customer's opt-in approvals:
 1. A true and complete copy of each opt-in notice provided to the customer;
 2. A true and complete copy of each opt-in approval provided by the customer;
 3. A true and complete copy of each written confirmation sent to the customer;

4. A list of the opt-in approvals provided by the customer, including for each:
 - a. The date the opt-in approval was received by the utility;
 - b. A list of the types of services provided by the agents, affiliates, associates, or third parties for which disclosure was authorized; and

Revision to reduce burden and cost of compliance.

- c. A list of the purposes for which use or disclosure was authorized;
5. A true and complete copy of each the confidentiality provisions contained in each agreement executed as required by R14-2-2203(C);
6. A true and complete copy of each the confidentiality provisions contained in each agreement executed as required by R14-2-2205(F); and

Revision to allow confidentiality provisions to reside within the contractor master agreement for simplicity and to conform with industry practice.

7. Documentation of the utility's verifications completed as required by subsection (B).

R-14-2207. Annual Reminders to Customers.

At least every 12 months, a utility that has obtained opt-in approval from a customer shall send the customer an annual reminder:

1. By mail or electronic mail with return receipt requested to ensure that the customer receives the annual reminder;
2. Separately from any other communication from the utility;
3. Explaining clearly the customer's current opt-in approval status, including a list of the type of service provided by the agents, affiliates, associates, or third parties for which disclosure has been authorized; and a list of the purposes for which use or disclosure has been authorized; and and
4. Informing the customer of a toll-free telephone number, and any other available method, through which the customer can notify the utility if the utility has made an error regarding the customer's opt-in approval status or the customer desires to change revoke the customer's opt-in approval.

Revisions to reduce burden and cost of compliance.

R14-2-2208. Duration of Opt-In Approval.

A customer's opt-in approval shall be automatically renewed and shall remain in effect until the customer revokes, ~~modifies, or limits~~ the opt-in approval.

Revision to reduce burden and cost of compliance.

R14-2-2209. Exceptions to Opt-In Approval Requirements.

A. Notwithstanding the other Sections in this Article, a utility may use or disclose, without customer opt-in approval, a customer's private customer information for the following purposes:

1. To protect the utility's rights or property, including but not limited to debt collections;

Revision for clarity of language and to conform with industry practice.

2. To protect another customer's rights, property, or utility service;
3. To protect another utility from fraudulent, abusive, or unlawful use of, or subscription to, the utility's services;
4. To comply with federal law or state law requiring or permitting disclosure of private customer information under specified circumstances that are applicable to the use or disclosure involved;
5. ~~W~~In the case of emergency where such information is necessary for the protection of life or property of the customer or another person, and it is not possible to obtain the customer's consent beforehand;

Revision for clarity of language and to conform with industry practice.

6. To comply with federal or state law, where the release of private customer information is necessary to carry out the provisions of such law, such as Blue Stake laws; or where such information is necessary to enforce specific provisions of state or federal law; or
7. To comply with a subpoena, court order, civil investigatory demand, Commission Order, or Commission data or other local, state, or federal governmental agency request.

Revision for clarity of language and to conform with industry practice.

B. A utility shall create and maintain a record of each disclosure made under this Section, which shall include:

1. What private customer information was disclosed;

2. To whom the disclosure was made;
 3. For what purpose or purposes the disclosure was made, including a reference to the subsection authorizing the disclosure;
 4. The date of the disclosure; and
 5. Whether the disclosure was made voluntarily or in response to a request or order.
- C. A utility shall, within 10 days after each disclosure made under this Section, send notice of the disclosure to the Commission and to each affected customer, with the notice to include, at a minimum the information listed in subsection (B). Notwithstanding, a notice of disclosure need not be provided to the customer when it would interfere with a legitimate law enforcement purpose.
- D. A utility shall disclose a customer's private customer information to any person identified by the customer, upon request from the customer received in either a written or electronic format, including an oral request that is recorded and retained by the utility in accordance with R14-2-2214.

Revision to allow customers to opt-in through the utility's call center.

R14-2-2218. Marketing Provision of Utility Information to the Customer.

~~These rules do not preclude a utility from inserting marketing providing information on the utility's services and programs to the customer or requesting an assessment from the customer regarding utility services and programs. into a customer's billing package. However, if the utility uses private customer information to target such marketing, and such marketing is not necessary for the provision of utility service, the customer's opt-in approval is necessary.~~

Revision to allow the utility to educate and inform customers of the services and programs available to them and to conform with current industry practice.

R14-2-2211. Aggregate Information.

A utility may use, gather and disclose aggregate information.

Revision for internal rule consistency.

R14-2-2212. Security Measures for Wireless Transmission of Private Customer Information.

- A. A utility shall continuously review and evaluate for use emerging security practices, technologies, protocols, and controls as necessary to update the security practices, technologies, protocols, and controls implemented by the utility.

- B. A utility shall ensure that private customer information transmitted wirelessly is protected from disclosure using encryption and password protection, or equivalent security measures, based upon the latest security practices, technologies, protocols and controls currently accepted as effective in the utility's industry.

Revision to conform with current industry practice.

R14-2-2213. Prior Commission Approval and Customer Consent Needed for the Collection of Certain Private Customer Information.

These rules do not authorize measurement from meters specific to any particular appliance or electrical device unless approved or required by the Commission as a specific tariff or program, and or the customer requests to be on such tariff or program.

Revision to conform with current Commission and industry practice.

R14-2-2214. Retention of Documentation.

Unless specified otherwise, the documentation required by this Article 22 shall be retained by the utility for the period of time the customer remains a customer of the utility, plus a minimum of one year.

Revision to provide retention requirements.