

WASHINGTON ELECTRIC COOPERATIVE, INC.

POLICY BULLETIN NO. 84

SUBJECT: PRIVACY OF MEMBER-CONSUMER INFORMATION

I. Objective

To establish policies and procedures that protect the privacy and confidentiality of member-consumers' information including, but not limited to electricity use data, and to ensure that WEC's procedures are in compliance with applicable state and federal statutes and regulations.

II. Policy

A. Notice

WEC shall inform its member-consumers of its privacy and confidentiality policies relating to the collection, maintenance, use, and disclosure of personally identifiable information about its member-consumers, shall make a copy of such policies available on its website, and shall furnish a printed copy to any member upon request.

B. Trust

General Practices: WEC maintains information about member-consumers for purposes related to its operations and management. Information is collected only through lawful means and for appropriate purposes. WEC is committed to maintaining accurate, complete, timely, relevant, and appropriate information about member-consumers as necessary for the purposes for which the information is to be used. WEC will ensure that its members' data and/or information are not disclosed to third parties, except when (1) the member consents, (2) disclosure is required in order for WEC to provide reliable electric service or efficiency services or (3) disclosure is required by law.

C. Nature of Member-Consumer Information Collected by WEC

1. WEC collects and maintains information from member-consumers, including name; address; telephone number; e-mail address; Social Security number and other credit information; billing, detailed usage data, and payment history; patronage capital account information for members and former members; participation in energy efficiency programs; and/or purchase of products and services other than electricity. Additional personal information collected may pertain to a member-consumer's property and electrical loads, medical information for emergency and outage restoration purposes, service history, and information maintained for purposes of service provision at the member's premises (e.g., warning about a dog in the yard).
2. WEC may survey a sample of its member-consumers to collect information to identify needs, improve service, and/or comply with regulatory requirements.

Third-party market survey contractors hired by WEC will comply with all privacy protections and provisions of this policy.

D. Security & Access to Data by In Home Display or Home Area Network

1. WEC maintains technical, administrative, and physical safeguards to protect member-consumer information against loss, unauthorized access, destruction, misuse, modification, and improper disclosure. No record or computer system can ever be fully protected against every possible hazard. However, WEC provides reasonable and appropriate security to protect against foreseeable hazards.
2. WEC uses a power line carrier (PLC) technology to remotely read members' meters for billing and reliability purposes. WEC's metering technology can allow for use of wireless communication (e.g., Zigbee protocol), from the meter to an In Home Display (IHD) or a Home Area Network (HAN). Use of a HAN or IHD is a member's choice and such devices and equipment are the property and responsibility of the member. When a Member directs WEC to install a Zigbee-enabled meter, WEC will assure that the internal IHD or HAN complies with WEC's specifications. However, once any additional member-owned communication devices interface with WEC's billing system, WEC's liability shall be limited to data within its own operational system and WEC shall not be liable for data created by or imported into a member's IHD or HAN.
3. WEC requires assurances from its affiliates and contractors who have access to identifiable member-consumer information that they and their employees are aware of this policy and agree to maintain equivalent confidentiality protections and limit the use of the information provided by WEC pursuant to this policy.

E. Use and Disclosure

WEC uses and discloses information about member-consumers in the normal course of business. This section describes how this information may be used and disclosed.

1. Information may be used by WEC and/or disclosed to affiliates or contractors hired by WEC to assist in carrying out operations, such as maintaining or restoring electric service, right of way maintenance, billing, energy audits and other efficiency and loan management activities, newsletter and other communications, and management functions including legal, audit, and collection services.
2. Member-consumer information may be disclosed to and shared with consumer credit reporting agencies for credit-related activities (e.g., the reporting of bad debts).
3. Information may be disclosed to government regulators and other government agencies when authorized by the member or required by law, including requests for information in response to a search warrant, subpoena, or court order. In the event of a compelled disclosure in response to a search warrant, subpoena, or court order, WEC shall inform the member and provide a copy of the request for

records within 24 hours or the next business day, unless the judicial order or subpoena lawfully prohibits disclosure. In the case of a criminal or civil subpoena, records shall not be disclosed for five business days unless otherwise ordered. Disclosures may also be made to protect WEC's legal rights or during emergencies if physical safety to persons or property is believed to be at risk. These events are unlikely, but they are possible. WEC will take reasonable steps to limit the scope and consequences of any of these disclosures.

4. Information may be shared with other utilities under shared service agreements or to meet operational requirements.
5. Information about a member-consumer may be disclosed at the request of or with the permission of the member-consumer, such as a request for a credit reference. Information about capital credits may be disclosed to the beneficiaries of deceased former members. In accordance with WEC's Bylaws Article V Section 7 (i), membership lists may be disclosed to a member of the Cooperative for a proper purpose relating to Cooperative business, such as in connection with Cooperative election activities. Misuse of such information is subject to legal action.
6. WEC does not sell, rent, loan, exchange, or otherwise release mailing lists, email addresses, or telephone numbers of member-consumers for marketing purposes. However, WEC may undertake a mailing to its members on behalf of an affiliated entity for the purpose of or in connection with offering products and services to its member-consumers.
7. Access and Correction: WEC generally permits its member-consumers to access and seek correction of records about themselves that are used by WEC to provide service, for billing, and to manage patronage capital accounts. Any person who wants to identify personal records maintained by WEC, access the records, or correct the records should contact a WEC Member Service Representative. WEC may provide members with secure personal access to their usage information via internet or other electronic means.

#### F. Questions and Disputes

Questions about this policy or any disputes over access, correction, or other matters may be directed to WEC's Manager of Information Systems in writing at Washington Electric Cooperative, P. O. Box 8, East Montpelier, VT 05651, email [WecMembers@wec.coop](mailto:WecMembers@wec.coop), or telephone (802) 223-5245.

### III. Responsibility

Member Services Supervisor  
 Manager of Information Systems  
 General Manager

BOARD APPROVAL: \_\_\_\_\_ Attest, \_\_\_\_\_

Date

Secretary

Prior Approval: August 31, 2005