

Customer Privacy Policy

September 20, 2016

Cathy Melton - Customer Service Program Analyst

Kerri Wendell – Customer Accounting Manager

Today's discussion

- Customer privacy policy overview
- What policy will include
 - When consent is required
 - When consent is not required
 - Obtaining customer consent
 - Handling of customer complaints
- Next steps *No action today*

Customer Privacy Policy Overview

- While the District does not sell customer information, we do not have a formal policy
- 2015 Legislature passed HB 1896 and HB 2264 (RCW 19.29A.100)
 - Law requires board adopted policy by Oct. 9
 - Law prohibits electric utilities from selling customer information
 - Law prohibits electric utilities from disclosing customer information for marketing purposes without the written consent of the customer
 - Law requires the board's policy to include a process for investigation/resolution of customer complaints of possible violation of the law
- Policy oversight to be performed by Red Flags committee

Policy will include:

- When customer consent is required
 - Advance customer consent is required before a utility can:
 - Disclose private or proprietary information for the purposes of marketing products or services the customer does not already subscribe to

Policy will include:

- When customer consent is not required
 - Customer information is disclosed to a third party directly related to conduct of utility business
 - Non-disclosure or confidentiality agreement with contractors required
 - Aggregated data that does not allow specific customer information to be identified

Policy will include:

- How customer consent is obtained
 - Customer consent is gathered in hard copy or electronic form
 - PUD must retain copy for records
 - Customer maintains option to withdraw consent

Policy will include:

- Handling of customer complaints
 - Customer notifies PUD in writing if they believe their data has been disclosed including:
 - Summary of the disclosure
 - Action requested to resolve
 - Informal meeting with customer
 - Investigation by staff
 - Report findings back to customer
 - Process continues until issue resolved
 - Customer can appeal to the Board if not satisfied with the outcome

Next steps

- Resolution and policy presentation Oct. 3

Questions?

