

ROCHESTER PUBLIC UTILITIES  
BOARD POLICY STATEMENT

POLICY SUBJECT: APPLICATION FOR SERVICE

POLICY OBJECTIVE:

To ensure the safeguard of customer identity and to hold Applicants accountable in situations whereby an Applicant falsely presents themselves to gain the benefit of utility service provided by Rochester Public Utilities (RPU). Service(s) is defined as electric and/or water service provided by RPU. An Applicant is defined as anyone applying for Service(s) and any person who has benefited from the Service(s).

POLICY STATEMENT:

The intent is to eliminate circumstances of fraudulent or dishonest activity in the attempt to avoid payment when establishing applications of new service, and to hold each Applicant financially responsible for any outstanding debt that has incurred from past and/or current Service(s) provided by RPU. Applicants establishing Service(s) must be at least 18 years of age or legally emancipated.

1. Application of New Service(s)

A. In accordance with the Red Flags Rule by the Federal Trade Commission, RPU developed a Theft Prevention Program to identify relevant red flags for new and existing accounts to prevent identity theft. RPU reserves the right to notify the proper authorities of any fraudulent activity relating to one's identity and/or property. Residential Applicants requesting to establish Service(s) shall provide, at a minimum, the following information:

- Legal name of Applicant
- Service address and/or mailing address
- Date of service connection
- Social Security number or valid photo ID (must be presented in RPU service center)
- Other adult occupants including those on the lease (if applicable)
- Daytime telephone number#
- Renter or owner specification

Commercial accounts are requested to provide a Tax ID # as well as name(s) of the individual(s) acting on behalf of the organization/business.

B. Upon application of Service(s), RPU staff completes a process to identify any type of questionable or fraudulent activity. The first process is to run a query on the customer's social

security number through a third party service. If the report returns a “Red Flag” then RPU will request further documentation such as a photo ID, passport, and/or social security card to be presented in person at the service center. The second precautionary measure is to review the status and history of the location that the new Applicant is seeking Service(s). If there is any type of questionable activity, RPU will proceed with Section C. Questionable activity may include, but is not limited to the following:

- Unpaid bills
- Disconnected Service(s)
- Attempts to change the name of the account holder
- Invalid social security number
- Multiple inquiries on the account by individuals other than the current account holder
- The property was declared uninhabitable or in violation of City of Rochester codes and ordinances
- Property address is listed as homestead (non-rental) and Applicant indicates they are renting
- Falsified or forged lease
- Cancellation of service
- Altered identification including a falsified ID or Passport

C. If such suspicious activity occurs, RPU will request the Applicant to come to the office and provide a valid picture ID, social security card, current and legal lease, verification by the landlord, or proof of ownership to make this determination.

D. If proper documentation is not presented in fulfillment to RPU’s requests, then RPU will delay connection of Service(s). RPU may also notify the Department of State of possible passport fraud and/or the Social Security Administration of possible security number fraud.

## 2. Prior Indebtedness

A. RPU may withhold or discontinue Service(s) to an Applicant until all outstanding debt with RPU has been paid or settled in full. This includes all prior indebtedness to RPU at any one or more locations. RPU may also delay utility service or request payment for prior indebtedness by a previous customer if the current Applicant or customer occupied the premises and/ or received the benefits of the Service(s) at the time the prior indebtedness occurred, and/or the previous customer continues to occupy the premises.

B. In the event that an individual attempts to change names on an account, anyone who has benefited from the Service(s) will be held equally responsible for the outstanding bill regardless of whose name is actually on the billing statement. If a Service(s) has been disconnected for non-payment, the disconnection will stand until the outstanding bills have been paid.

## 3. Resumption of Service(s)

A. Utility service that has been discontinued for any federal, state, or local code of violation, fraud, failure to pay, or violation of any part of RPU policy and/or procedure, Service(s) will not be resumed until the situation requiring such action has been corrected to the satisfaction of RPU and/or any other government agency. Some properties may require an inspection from the Rochester Building Safety department before Service(s) may be reinstated.

B. If a service has been reconnected without RPU's authorization, RPU may discontinue Service(s) without notice to the customer. Meter tampering fees and other legal action may be taken in such circumstances.

C. Disconnected Service(s) will not be resumed for any other individual(s) who remain at the residence or have occupied the premise during the time any outstanding debt was accumulated. Reinstatement of Service(s) will occur after all charges/debts/fees have been paid.

D. In the event that there may be a change of name(s) on an account where the Applicant is renting, RPU can request any landlord to fill out the Landlord Affidavit (attached form). This form must be signed and notarized before any other individual receives Service(s). If RPU finds the Landlord Affidavit form to be forged or falsified, RPU may disconnect the Service(s).

E. RPU may interrupt Service(s) if the property is declared uninhabitable or condemned. In this event, Service(s) will not be reinstated until the property is declared inhabitable and no longer a safety concern.

#### 4. Third Party Disclosure

A. In accordance with Minnesota Statute 13.685 regarding customer data, RPU will classify all Applicants' information as private. RPU may only release information to those specified within the statute unless permission is granted by the account holder.

B. In the event that a disconnection for non-payment may occur at a rental property, RPU may notify the homeowner/landlord that a disconnection may be performed based on such circumstances; however, RPU may not disclose any other account information other than the fact that Service(s) will be terminated due to lack of payment. RPU may disclose information to third parties with the consent of the account holder. RPU may request written documentation from the account holder to release any billing information and/or to make other changes to the account.

#### 5. Intentional Interruption of Service(s)

A. In accordance to Minnesota Statute 504B.225, RPU will not terminate Service(s) as requested by a landlord, agent, or any other person acting under the landlord's direction or control, with the intent to unlawfully and intentionally remove or exclude a tenant from a residence.

#### RELEVANT LEGAL AUTHORITY:

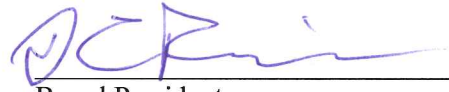
Minnesota Statute 504B.221

Minnesota Statute 504B.225  
Minnesota Statute 13.685  
Minnesota Administrative Rules 7820.0700  
Minnesota Administrative Rules 7820.1000  
Minnesota Administrative Rules 7820.1100

EFFECTIVE DATE OF POLICY: June 28, 2016

DATE OF POLICY REVIEW:

POLICY APPROVAL: June 28, 2016

  
\_\_\_\_\_  
Board President  
July 1, 2016  
\_\_\_\_\_  
Date