

ROCHESTER PUBLIC UTILITIES  
BOARD POLICY STATEMENT

POLICY SUBJECT: Customer Data

POLICY OBJECTIVE:

Rochester Public Utilities (RPU) understands that privacy is important to its customers, and respects customer's privacy concerns. Additionally, RPU is subject to the Minnesota Government Data Practices Act (MGDPA) in the manner in which RPU collects, creates, receives, maintains, or disseminates data. This Policy describes what customer data is collected, how it is used, and how it is maintained under the MGDPA.

POLICY STATEMENT:

**1. Information RPU may collect:**

- a. Contact information (such as name, postal address, email address, phone number, employer, authorized third party representatives)
- b. Personal identification information (such as driver's license number, Social Security number)
- c. Demographic data (such as dwelling size and type, business size and type, owner/tenant, household income)
- d. Service address and dates of service
- e. Information about customers participation in our renewable energy, energy efficiency, or energy conservation programs
- f. Account history (such as disconnection notices issued, disconnection and reconnection dates, payment arrangements, late payment notices)
- g. Account notes detailing interactions with customers via phone, email, fax, and/or social media
- h. Energy and water usage data specific to an account
- i. Customer payment history and details (such as payment amounts and dates, financial account number, routing number, and billing address)
- J. Other information customers may provide us

**2. How RPU uses the information that is collected**

- a. To assist customers in establishing an account with RPU

- b. Provide, bill, and collect for RPU products and services
- c. Communicate with customers, respond to customer questions and comments, and provide customer support
- d. Administer customer participation in events, programs, rebates, surveys, and other offers and promotions
- e. Operate, evaluate, and improve our business, products and services (including developing new products, analyzing our products and services, optimizing our customer experience, managing our distribution system, reducing costs, improving accuracy and reliability, performing accounting, auditing and other internal transactions)
- f. Protect against fraud, unauthorized transactions, claims, and other liabilities

### **3. Information Disclosures**

RPU will not disclose information about customers except as described in this policy. Under Minnesota law, data on customers of municipal electric utilities are classified as private data or nonpublic data, but may be released to:

- a. A law enforcement agency that requests access to the data in connection with an investigation;
- b. A school for the purposes of compiling pupil census data
- c. The Metropolitan Council for use in studies or analysis required by law;
- d. A public child support authority for purposes of establishing or enforcing child support;  
or
- e. A person where use of the data directly advances the general welfare, health, safety of the public

RPU may disclose customer data for one of these purposes provided the City Attorney has reviewed the request and deemed it in compliance with the MGDPA or other applicable law.

RPU and City officials and staff, as well as state agencies such as the Department of Commerce, may reasonably require access to private or confidential data in the course of their work duties or responsibilities.

RPU may also disclose information about customers to service providers who perform services on our behalf, such as companies that assist RPU in providing products and services to customers, billing customers, or processing credit card payments. RPU contractually requires these service providers to comply with the protections of the MGDPA, and limits the access and use of private information to that reasonably necessary to perform specific contracted services.

RPU may disclose aggregated energy and water usage data (without reference to specific customers) to third parties as allowed under the MGDPA.

**4. Data Security**

RPU will maintain administrative, technical, and physical safeguards designed to protect the security and privacy of the information that is maintained about customers. Administrative controls will consist of:

- a. MGDPA compliance training for new employees and annual refresher training for existing employees.
- b. Maintaining a list of recipients of shared data to include the third party receiving the data, frequency, delivery method, and information shared. This list will be audited annually by the City Attorney for compliance with the MGDPA and reviewed with the Board. All new third-party requests for customer data not part of the existing audited list will first be reviewed by the City Attorney's office for compliance with the MGDPA.
- c. Following procedures for ensuring that private or confidential data are only accessible to persons whose work duties reasonably require access to the data, and that such data is accessed for the purposes described in this policy.

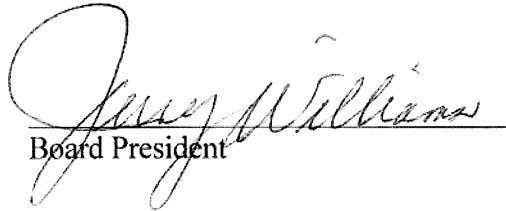
RELEVANT LEGAL AUTHORITY:

Minnesota Government Data Practices Act

EFFECTIVE DATE OF POLICY:

September 30th, 2014

POLICY APPROVAL:

  
Board President

Date

10/9/14

