

# Access to Customer Data



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# Privacy of Personally Identifiable Information

Privacy of personal information involves the right to control when, where, how, to whom, and to what extent an individual shares their own personal information, as well as the right to access personal information given to others, to correct it and to ensure it is safeguarded and disposed of properly

# Customer Personally Identifiable Information

- Customer Personally Identifiable Information (CPII) is information about a customer that can be used to distinguish or trace a customer's identity or that can be linked or linkable to a customer
- CPII is information that can identify a customer, provide information about specific aspects of the customer's activities or could be logically linked with or associated with other information about a customer
  - Aggregated data is not considered to be CPII
- As a general rule, BGE only provides CPII to a third party when:
  - Regulation or law requires it, including receipt of a subpoena or similar other legal process
  - Positively affirmed by the customer, unless an opt-out mechanism is approved by regulation or law
  - Vendors hired by the utility to perform specific work or analysis on behalf of the utility, after executing a confidentiality agreement

# Data Provided to Licensed Energy Suppliers

- This will also apply to Curtailment Services Providers who must become licensed by the Maryland Public Service Commission as an Electricity Supplier
- BGE complies with regulatory and legislative requirements
- The supplier must obtain the customer's consent to access any customer data or to enroll a customer
  - Customer must provide a Choice ID to the supplier
- BGE offers suppliers the ability to purchase a customer list; customers can opt out of being included in the list
  - Includes Name, Address, Fuel Type
- BGE provides web-based access to usage data to third parties primarily providing energy-related products and/or services
  - The third party must have customer consent and the customer's Choice ID number

# BGE Customer Data Philosophy

- BGE has a unique and direct relationship with over one million customers
  - Customers must have confidence that BGE will honor their right to privacy
- BGE must assure all aspects of BGE's CPII is protected and to provide accountability for protecting all CPII
  - BGE is working with the other Exelon Companies to develop best practices to be implemented throughout all the Exelon Utilities
- BGE developed a BGE Customer Smart Meter Data Privacy Policy specifically to address the interval data that is becoming available as we install Smart Meters
  - The policy is currently being reviewed by the Maryland Smart Grid Working Group