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PUBLIC SERVICE COMMISSION

July 22, 2016

Ms. Talina R. Mathews Executive Director Kentucky Public Service Commission 211 Sower Blvd P O Box 615 Frankfort, KY 40602-0615

RE: Case No. 2012-00428 Additional information to initial response

Dear Ms. Mathews:

Enclosed are an original and three (3) copies of Shelby Energy Cooperative Inc.'s ("Shelby Energy") additional information to the initial response to the filing required for item #4 of the order.

Should you have any questions or need further information, please let us know.

Sincerely,

elisa J. Mastin

Debra J. Martin President and CEO

Enclosures

www.shelbyenergy.com

620 Old Finchville Road · Shelbyville, Kentucky 40065-1714 Shelby Co. (502)633-4420 · Trimble Co. (502)255-3001 · 1-800-292-6585

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

CONSIDERATION OF THE IMPLEMENTATION OF)CASE NO.SMART GRID AND SMART METER TECHNOLOGIES)2012-00428

SHELBY ENERGY COOPERATIVE, INC.'S ADDITIONAL INFORMATION TO THE INITIAL RESPONSE TO THE COMMISSION 'S ORDER DATED APRIL 13, 2016

SHELBY ENERGY COOPERATIVE, INC.'S ADDITIONAL INFORMATION TO INITIAL RESPONSE TO THE COMMISSION'S ORDER DATED APRIL 13, 2016 CASE NO. 2012-00428

ITEM:

4. Within 60 days of the date of this Order, the joint Utilities shall file with the Commission their internal procedures governing customer privacy and customer education.

RESPONSE:

- A. Customer Policy: Refer to Exhibit A, pages 1-4 for a copy of Shelby Energy's *Member Information Privacy Policy* as approved by the board of directors on July 14, 2016.
- B. Customer Education: Refer to Exhibit B, pages 1-3 for a copy of Shelby Energy's Member Education and Communication Policy as approved by the board of directors on July 14, 2016.

SHELBY ENERGY COOPERATIVE, INC. Shelbyville, Kentucky

POLICY NO. 501

MEMBER INFORMATION PRIVACY

I. OBJECTIVE

Shelby Energy Cooperative, Inc. ("Shelby Energy") respects the privacy and confidentiality of member information and is committed to operational practices that protects member information. This policy describes the information that Shelby Energy collects from its members as a routine part of its operations, and how it uses, protects, and shares the information that it collects.

II. DEFINITIONS

- 1. <u>Member.</u> Person, firm, corporation, limited liability company, body politic, or other entity receiving service from Shelby Energy
- 2. <u>Operational information</u>. Information pertaining to one or more members that does not identify an individual member but includes detailed data about system operations, utility services or programs provided to one or more members.
- 3. <u>Personally identifiable information (PII)</u>. An individual member's information that consists of names, address, date of birth, social security numbers and other information that specifically identifies the member to which it applies.
- 4. <u>Anonymous information</u>. Member information that may be disclosed to parties other than the member in a manner that will protect the identity of the member.
- 5. <u>Aggregate information</u>. Information regarding more than one member combined in such a manner that it does not identify an individual member.
- 6. <u>Associated third-party.</u> Third-party contractors, vendors, energy efficiency program partners, governmental entities, or non-profit utilities, or other entities with whom it is necessary to share member information for Shelby Energy to provide energy services and energy efficiency programs. For direct

payments or rebates made to the member by an associated third-party, a controlled set of the member's PII is provided to the vendor.

- 7. <u>Unassociated third-party</u>. Any person or entity not directly involved with Shelby Energy's routine operations.
- 8. <u>Privacy.</u> The expectation by a member that the member's information will not be disclosed to an unassociated third-party without the member's consent. In contrast, member information will be shared with associated third-parties from time to time on an as-needed basis.

III. CONTENT

A. <u>Accountability</u>

Shelby Energy assumes the following:

- 1. It is accountable for the member's PII within Shelby Energy's possession.
- 2. It is responsible for personal information in Shelby Energy's control that has been transferred to an associated third-party for processing. Shelby Energy will use contractual or other means to provide a comparable level of protection. Shelby Energy cannot be responsible for PII provided by the member to an unassociated third-party.
- 3. It will not sell or distribute the PII of its members.
- 4. It will limit collection of information to that which is reasonable and necessary to provide electric service, participation in an energy efficiency program, use of a specific tariff or other program.
- 5. It will adopt procedures to protect personal information, receive and respond to complaints and inquiries and train employees regarding these policies and procedures.

B. <u>Member Information Collected</u>

PII and Operational information obtained by Shelby Energy regarding a member and persons associated with the member's account include, but aren't limited, to the following:

- 1. The name and address and other contact information, such as telephone numbers and e-mail addresses;
- 2. Facts regarding consumption of energy, both historic and current;

- 3. Data concerning a member's transactions with Shelby Energy, such as account numbers, account balances and payment history;
- 4. Credit and reference information, such as date of birth, social security number, employment information, driver's license, previous addresses, and general financial data;
- 5. Medical information to be used in case of emergency power outages; and
- 6. Financial institution information for pre-authorized payments.

C. <u>Purposes of Member Information Collected</u>

Shelby Energy obtains personal and/or operational member information for the following purposes:

- 1. Conduct the business of Shelby Energy;
- 2. Determine the current status of a member's energy service;
- 3. Assess credit risk, including obtaining credit reports;
- 4. Communicate with the member and address any service issues or needs;
- 5. Bill accounts, maintain payment records, and give notice on current balance;
- 6. Assemble statistics about how Shelby Energy's website is accessed and used;
- 7. Compile Aggregate information that does not identify the member as an individual;
- 8. Contact members about outages and services offered by Shelby Energy and third-party energy-efficiency programs partners;
- 9. Provide Aggregate information to Community Action Council ("CAC") agencies, upon request;
- 10. Respond to federal, state, local regulatory agencies; and
- 11. Collect debts owed by a member
- D. <u>Member Access to Information</u>

Members shall have access to their individual information, including but not limited to, historical data regarding electric usage, respective billing units and the current applicable tariff by the following methods:

- The internet member portal may be accessed by all Shelby Energy members by using a personal User ID and Password through Shelby Energy's website at: <u>www.shelbyenergy.com</u>. If a personal security code has not been established, the member may contact Shelby Energy by telephone and assistance will be provided on how to set up the code.
- 2. Members may contact Shelby Energy and the requested information will be mailed directly to the member or may be picked up by the member, with proper identification, at one of Shelby Energy's offices during regular business hours.
- E. <u>Disclosure of Member List</u>

An appropriate member list may be disclosed to a member of Shelby Energy for proper purposes, such as in connection with election activities.

- F. <u>Security</u>
 - 1. Shelby Energy maintains member information with reasonable and appropriate technical, administrative, physical and cyber safeguards to protect against loss, unauthorized access, destruction, misuse, modification, and improper disclosure of member-consumer information.
 - 2. A summary of this Member Information Privacy Policy will be posted on the Shelby Energy website.
- G. <u>How to Contact Shelby Energy</u>

This policy is maintained by Shelby Energy at the headquarters office located below. Questions regarding the policy may be directed to this office.

Shelby Energy Cooperative
Attn: Member Privacy
620 Old Finchville Road
Shelbyville, KY 40065
E-mail at: shelbyenergy@shelbyenergy.com
Telephone: 502-633-4420 or 1-800-292-6585

IV. RESPONSIBILITY

A. The President and CEO is responsible for the administration of this policy.

Adopted: 07/14/16 Revised:

SHELBY ENERGY COOPERATIVE, INC. Shelbyville, Kentucky

POLICY NO. 502

MEMBER EDUCATION AND COMMUNICATION POLICY

I. OBJECTIVE

To fulfill our mission, Shelby Energy Cooperative, Inc. ("Shelby Energy") is committed to educate members and the public with knowledge and tools to safely and efficiently use energy to enhance their quality of life.

II. CONTENT

A. Educational Content

Basic information is provided to members, our communities and the general public, in each of the following areas, with the understanding that changing dynamics within our industry may expand or alter topics in each area. Topics listed in this policy are not all inclusive:

- 1. Organizational Data
 - a. History
 - b. Vision and mission statements
 - c. Corporate documents
 - d. Rules and regulations
 - e. Financial facts and documents
 - f. Board of director's information
 - g. Management team information
 - h. Schedule of board meeting dates
- 2. Electrical Safety
 - a. Power line safety for employees, members and public
 - b. Storm safety
 - c. Safety demonstrations for schools and emergency response personnel
 - d. Children's safety
 - e. Seasonal and routine safety tips
 - f. Safety during an outage
 - g. Safety apparel and practices of line technicians
 - h. Right-of-way safety
 - i. Safety events and pictures

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- 3. Utility Services
 - a. Available rates/tariffs
 - b. Member billing options; budget billing; BankDraft service, Prepay Service, etc.
 - c. Payment arrangements
 - d. Construction diagrams and specifications
 - e. Member survey data;
 - f. Notification of planned outages
 - g. Updates on service interruptions
 - h. Member assistance agencies
 - i. Fuel cost and environmental surcharge information
 - j. After-hours answering service
 - k. Outage reporting
- 4. Energy Efficiency
 - a. Energy efficiency programs and rebates
 - b. Contact information for member assistance
 - c. Energy calculator programs
 - d. Energy saving tips
 - e. Home energy audits
 - f. KY home performance;
- 5. Community Involvement
 - a. College scholarship
 - b. Frankfort Youth Tour
 - c. Washington Youth Tour
 - d. WinterCare assistance program
 - e. Participation in local civic and community organizations
 - f. Local career days
 - g. Speakers provided upon request
 - h. Honor Flight sponsor
- 6. AMI & Technological Benefits
 - a. Power-line-carrier AMI system with two-way communication
 - b. Power quality reporting for voltage fluctuations and momentary service interruptions
 - c. Daily readings and Meter Data Management system that empowers members to monitor usage and conserve
 - d. Remote connect/disconnect; enhanced safety for technicians and convenience for members
 - e. Improved modeling for distribution system with more accurate planning of system improvements and upgrades
 - f. Improved mapping system that assists line technicians during outage restoration
 - g. Improved outage data to members

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- h. Energy efficiency and load control of water heaters and air Case No. 2012-00428 conditioning
- i. Provides information to assist with high bill concerns
- j. Prepay Service rate option
- k. Reduction in cost to members for write-off of delinquent accounts

B. <u>Educational Media</u>

In addition to presentations, facilitated learning experiences, and employee managed demonstrations, the following methods are used to communicate the above content with members and the public on a regular basis:

- 1. *Kentucky Living Magazine* monthly publication provided to all members
- 2. Bill Insert periodic flyer included with member bill
- 3. Bill Message monthly written communication printed on member bill
- 4. Shelby Energy Website updated regularly with various information
- 5. Shelby Energy Facebook[©] items posted periodically
- 6. Shelby Energy Twitter[©] items posted periodically

II. **RESPONSIBILITY**

A. The President and CEO is responsible for the administration of this policy.

Adopted: 07/14/16 Revised: