

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Establishment of a Working )  
Case for the Writing of a New Rule on the ) **File No. AW- 2018-0393**  
Treatment of Customer Information by )  
Commission Regulated Electric, Gas, Steam )  
Heating, Water, and Sewer Utilities and their )  
Affiliates and Non-Affiliates )

**RESPONSIVE COMMENTS**

Summit Natural Gas of Missouri, Inc. (“SNGMO” or the “Company”) hereby files its responsive comments in consideration of a new rule regarding the treatment of customer information by Commission-regulated electric, steam heating, water, and sewer utilities. The Company’s responsive comments are set forth below.

**1. What is an appropriate definition of "utility related services" for purposes of this rule?**

The definition of “utility related services” should include, but not be limited to, services involving a utility’s billing, credit checks, collections, efficiency programs, public outreach (internally, by third parties, and jointly with other utilities), facility safety advisements, low income assistance programs, energy solutions, and others.

**2. What is an appropriate definition of “non-utility related services” for purposes of this rule?**

At this time, SNGMO has no comment on this definition.

**3. In what situations, and for what purposes, is it appropriate for a utility company to share specific customer information with third parties without consent of the customer?**

A utility should be authorized to share customer information with third parties, without customer consent, to provide utility related services including billing, credit checks, collections, efficiency programs, public outreach (internally, by third parties, and jointly with other utilities), facility safety advisements, low income assistance programs, energy solutions, and others.

**4. What is an appropriate definition of "customer information" for purposes of this rule?**

The definition of "customer information" must distinguish "aggregated customer information" from "specific customer information." Aggregated customer information is that which is compiled or averaged for the purposes of analysis or processing. Aggregated customer information does not include information that can be used to identify an individual. Specific customer information, by contrast, is that which includes various personally identifiable information such as names, addresses, or telephone numbers and is sufficient to identify individual customers.

**5. How should a utility's privacy statement be shared with the public?**

**(A) Appear on website - How frequently?**

**(B) Mailed to shareholders - How frequently?**

**(C) Mailed to customers - How frequently?**

A utility's privacy statement should be shared with the public consistent with federal and state requirements.

**6. Should utilities advise their customers that their customer information is shared with other entities? If yes, what types of customer information sharing should be disclosed to customers? How and when should this disclosure occur?**

A utility's advisements to its customers regarding customer information shared with other entities should be consistent with federal and state requirements.

**CONCLUSION**

SNGMO appreciates the opportunity to submit responsive comments to the Commission regarding the consideration of a new rule regarding the treatment of customer information by Commission-regulated electric, steam heating, water, and sewer utilities. SNGMO may have additional comments once it has an opportunity to review the other responsive comments, and it will address all comments as allowed in Commission rules and procedures.

Dated this 30<sup>th</sup> day of November 2018.

Respectfully submitted,

By:  
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