

**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)
Treatment of Customer Information by) Docket No. AW-2018-0393
Commission Regulated Electric, Gas, Steam)
Heating, Water, and Sewer Utilities and Their)
Affiliates and Nonaffiliates)

COMMENTS OF PEPPER IoT

SmartHome Ventures, LLC (also known as "Pepper IoT") is a Delaware Limited Liability Corporation based in Kansas City, Missouri. Pepper IoT has built and operates an independent, multi-tenant Internet of Things (IoT) communications platform focused on delivering high-quality and secure connected device services to end-users. Pepper IoT brings a unique full-stack solution that governs and protects all data communications from the connected device(s) to the user, and all points in between. Additionally, Pepper IoT offers a secure operating system and service delivery platform that empowers enterprises to deploy customized and sophisticated IoT solutions.

The Missouri PSC has sought public comment regarding how regulated utility companies should treat customer information. Pepper IoT does not offer a position on any specific rule language offered in this docket, although it does applaud the continued effort by the Missouri PSC to address issues of data privacy and security. Pepper IoT offers these comments for informational purposes only.

As more products and services are offered by utilities and third-party vendors to empower utility customers, it is important for policy-makers to understand the data security environment that exists at the *intersection* of the utility space and electronic consumer products. This includes the data security and privacy environment of everything from electric vehicle charging facilities to thermostats to IoT light bulbs.

Pepper IoT offers the attached report, "The State of IoT Security" by Dark Cubed as Schedule A to these comments. The Report highlights the current state of consumer -grade device IoT data security and privacy worldwide. As the utility industry evolves into a more open-platform for customer empowerment and choice, so to should the policy-makers understanding of data privacy and security threats at the intersection of the customer, the utility and third-party vendors.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been e-mailed to all counsel of record this 30th day of November, 2018.

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/s/ Joshua Harden _____