

**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)	Case No. AW-2018-0393
Commission Regulated Electric, Gas, Steam)	
Heating, Water, and Sewer Utilities and their)	
Affiliates and Non-Affiliates)	

ADDITIONAL COMMENTS FROM MISSOURI-AMERICAN WATER

COMES NOW Missouri-American Water Company (“MAWC” or the “Company”) and submits additional comments in response to the Missouri Public Service Commission (“Commission”) Order Establishing Time to File Additional Comments arising from the Customer Information Workshop held October 9, 2018. MAWC’s response to the questions from Commission Staff are as follows:

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

For purposes of this rule, an appropriate definition of “utility related service” would be “a tariffed service or a service provided to enable or facilitate the provision of a tariffed service.”

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

For purposes of this rule, an appropriate definition of “non-utility related service” would be “a service that is neither a tariffed service nor a service provided to enable or facilitate the provision of tariffed service.”

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?

It is appropriate for a utility company to share specific customer information with third parties without consent of the customer for purposes of performing a utility related service, under the conditions stated in section 3(A) of the draft rules.

It is appropriate for a utility company to share specific customer information with third parties without consent of the customer as and to the extent required by law.

4. What is an appropriate definition of “customer information” for purposes of this rule?

An appropriate definition of “customer information” for purposes of this rule would be: “Customer information means information communicating customer attributes that can be traced to a particular customer (including without limitation name, address, phone number, social security number, utility service usage, payment history, financial account, driver’s license number, medical information, and health insurance information). Customer information does not include information that cannot be traced to a particular customer (including without limitation anonymized, aggregated data).”

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) A utility's privacy statement should be constantly maintained on the utility's website. B) A utility's communications with shareholders is subject to existing regulations under the jurisdictions of other regulatory bodies. C) At least annually, a utility should advise customers how to access the utility's privacy statement online or request a physical copy at no charge to the customer.

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, and how and when should this disclosure occur?

Utilities should advise their customers approximately as follows: Customer information (defined as above) may be shared with other entities for the purpose of providing utility-related services or to comply with legal requirements without customer notice or consent. Except as required by law, customer information will not be shared with other entities for any other purpose absent customer consent. Information that cannot be traced to a particular customer (including without limitation anonymized, aggregated data) may be shared with other entities for any purpose without customer notice or consent.

This disclosure should be stated in the utility's privacy statement, which should be disseminated as discussed above.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 30th day of November, 2018, to parties of record.

/s/ Timothy W. Luft