Date Filed: August 14, 2026

Witness: Christopher Leigh, Jared A. Lawrence, and Timothy W. McGrath
Request from: Office of Education, Outreach, and Enforcement

Question:

(DATA RETENTION AND SYSTEM DESIGN) Explain the Company's policies and system capabilities regarding the collection and retention of customer identification information at account creation, including why the Company retains only the last four digits of an identification number and why the system does not designate or retain the type of identification used (e.g., Social Security number, driver's license, passport).

Response:

The Company collects customer identification information, such as a Social Security Number ("SSN") or other acceptable government-issued identification, when required to establish service and verify the customer's identity. Guidelines for protecting the confidentiality of Customer information maintained in Company information systems are defined in the Company's **160.3 Customer Confidentiality** policy (Exhibit CLP-REVREQ-2, Sch H-2.0 (F) at 15-16). Guidelines designed to detect, prevent, and mitigate identity theft in connection with new or existing residential and certain commercial utility accounts are defined in **250.3 Identity Theft** policy (Exhibit CLP-REVREQ-2, Sch H-2.0 (F) at 35-36).

Once the customer's identity has been verified and the account has been established, the Company's systems retain the *type* of identification the customer provided to establish service. Additionally, for a select few of the available identification methods, the system retains the identification number in a secure manner. To protect customer privacy and reduce the risk of unauthorized disclosure, the system masks and encrypts the majority of the identification number.