Date Filed: August 14, 2026

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

**Question:**

(ACCOUNTABILITY FOR SYSTEM LIMITATIONS) Does the Company's customer information systems require entry and retention of specific type of identification used to establish an account? If not, please explain why the Company's customer information systems do not require entry and retention of the specific type of identification used to establish an account, and identify any plans, timelines, or cost estimates to implement such functionality.

**Response:**

The Company's customer information system requires the entry and retention of the specific customer identification information used to establish a customer account. During the account creation process, customer identification information, such as a Social Security number or other approved government-issued identification, is collected to verify the customer's identity and support the establishment of service.

The customer information system retains the identification information used during the account establishment process, as further described in the Company's response to EOE-070[i], to maintain an accurate customer record and support ongoing account servicing.

**Prior Referenced Response:**

[i] EOE-070 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).

EOE-070 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.