

Xcel Energy Data Access Summary

A. Customer-Specific Data

Xcel Energy releases customer-specific data in limited circumstances:

- As **required by law** (*e.g.* subpoenas, warrants, court orders, or at the request of government agencies with jurisdiction).
- To **Contracted Agents** who assist us with the provision of regulated service (*e.g.* bill print, DSM, remote meter reading) if they also agree to a contract that contains our data privacy and security terms.
- To the **Customer** of record through specific programs (*e.g.* MyAccount, Green Button, Infowise) or through a verbal request made to our call center.
- To **Third Parties authorized by the Customer** of record.
 - Consent must be documented and verified using a form that provides sufficient information for informed consent. Instructions and a model form are available from our website:
(http://www.xcelenergy.com/My_Account/Understand_Bill/Bill_Details/Energy_Consumption_Data_Access). Consent forms are also available directly from our web privacy policy:
<http://www.xcelenergy.com/staticfiles/xcel/Online/PrivacyPolicy.pdf>.
 - No contractual requirements between Xcel Energy and the Customer's authorized third party.
 - Certain data types are excluded for release to third parties. We will not release the Customer's social security number or financial account number. We believe that the Customer is the more appropriate source for that information.

B. Aggregated CEUD Reports

Xcel Energy will release aggregated CEUD subject to certain restrictions:

- Xcel Energy only aggregates energy usage and program participation data.
- Data aggregation must pass the 15/15 standard (*e.g.* the data set includes at least 15 customers, and no one customer represents 15 percent or more of the energy consumption total).

Currently, Xcel Energy provides aggregated data at the state, county or city level.

Xcel Energy has received requests at more granular levels (*e.g.* neighborhood, census block, building). Because our billing system is not designed to identify customers by these types of identifiers, we cannot quickly and accurately produce aggregated data reports at these more granular levels. We are exploring options that we hope would make this functionality available.

1. *Granularity of CEUD Data*

Xcel Energy has a diverse meter population capable of many different levels of measurement (*e.g.* monthly, hourly, less than 15 minutes, etc.). While we have meters that are capable of reading customer energy usage at very granular levels, the most common interval collected and utilized for our business is monthly.

Most requests for access to Customer's CEUD are fulfilled utilizing monthly meter reads. Some Customers in our Commercial classes have special equipment that collects more frequent meter reads and shares them with third party service providers.

2. *De-Identified Data*

Xcel Energy receives requests for CEUD or program participation information by address with the customer's name removed. Because of the public availability of homeowner and tax payer information, we do not believe that such a request is sufficiently anonymous.

A limited exception has historically been offered for realtors and potential purchasers of property. When requested, we have provided an annual average consumption amount for a property address. However, this practice is being scrutinized internally and may not continue.