



# Privacy Policy

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# **I. Privacy Policy**

## **A. Introduction.**

HLP values the trust of the customers we serve. We recognize that to maintain that trust, we must safeguard the personal and private customer information we obtain and use for our utility operations.

## **B. Scope.**

This Privacy Policy establishes the administrative and procedural guidance Heber Light & Power Company will follow in our use of personal and private customer information. This Privacy Policy applies to all HLP officers, managers, employees, vendors, and other contract personnel with access to Customer Personal Information.

## **C. Statement of Policy.**

Heber Light & Power Company shall use reasonable means necessary to ensure that:

- I. Customer Personal Information is kept confidential as outlined;
- II. That Customer Personal Information is accessed only by those HLP Employees and Affiliates who have a legitimate business need connected to the provision of HLP services to Customers, for such information;
- III. That prior consent is obtained before any Customer Personal Information is released to a Third Party for any purposes other than those required for legitimate business purposes;
- IV. That appropriate safeguards be implemented to protect the privacy of Customer Personal Information.

## **D. Policy Changes.**

HLP may change and/or update this policy as needed. We encourage our customers to regularly review this Privacy Policy whenever they visit our website to stay familiar with the most current version.

## II. Definitions

**Affiliates:** “Affiliate” means an entity, vendor, service provider, contractor, independent contractor, or person performing a function or service for, with, or on behalf of HLP related to providing reliable utility service.

**Aggregated Data:** “Aggregated Data” means data or information regarding customer utility usage or other customer related information where Personal Identifying Information has been removed and the information is collected or combined (aggregated) with a sufficiently large group of customers that it is highly improbable that a person receiving such information could deduce the identities and/or electricity usage habits of individual customers.

**Customer:** “Customer” means a current or former customer of Heber Light & Power Company.

**Customer Consent.** “Customer Consent” is defined and discussed in Section VIII.

**Customer Personal Information (or Personal Information):** “Customer Personal Information” means “Personal Usage and Billing Information” and/or “Personally Identifying Information” as those terms are defined below. Information we collect that does not reveal details, patterns, or other insights into the customer’s identity, personal life, or activities will not be considered Customer Personal Information.

**Personal Usage and Billing Information:** “Personal Usage and Billing Information” is (1) data or information collected, received, and/or stored by HLP that relates to the source, technical configuration, destination, and amount of energy used by a utility retail customer, (2) customer’s payment history, (3) household data that is made available by the customer solely by virtue of the customer’s relationship with HLP, and (4) information contained in a HLP retail customer’s bill.

**Personally Identifying Information or PII:** “Personally Identifying Information” or “PII” means information that can be used to distinguish, reveal, or trace an individual’s identity that is linked or linkable to a specific individual, and consists of:

1. Names
2. Street and/or mailing addresses
3. Telephone or fax numbers
4. E-mail addresses
5. Birthdates
6. Social Security Numbers
7. Driver’s License Numbers
8. Utah identification card number
9. Account numbers, credit or debit card numbers, security access code or password or other numbers that would allow access to an individual’s financial accounts or financial information.
10. Information received as part of a credit check process consisting of unique personal identifying information related to finances.
11. Student, military, or passport id number
12. Biometric data including fingerprints, voiceprints, or other unique biological patterns or characteristics used to identify an individual
13. Any other unique identifying number, characteristic, or code.

As used in this Privacy Policy, Personally Identifying Information does not include personal information HLP collects in its capacity as an employer which is addressed under separate policies.

**Privacy Officer:** Heber Light & Power will identify an officer or employee to be responsible for implementing and reviewing HLP privacy procedures. The “Privacy Officer” shall have primary responsibility for overseeing the implementation and improvement of the Privacy Policy.

**Privacy Policy:** “Privacy Policy” means this policy.

**Public Information:** “Public Information” includes any non-privileged, non-Personally Identifying Information, or non-Customer Personal Information prepared, owned, used, or retained by HLP that is required to be disclosed, intended to be made available to the public.

**Third Party:** “Third Party” means a person, organization or entity authorized by a customer to receive Customer Personal Information, as outlined in this Privacy Policy.

**Utility:** “Utility” collectively refers to Heber Light & Power Company (HLP).

### III. Customer Personal Information Collected by HLP

The Company may request and collect Customer Personal Information under several circumstances related to its utility operations. Please reference Appendix A which is provided as an attempt to provide you with a reasonably complete list of the information HLP may collect in relation to its operations, programs, and services.

### IV. Customer Rights

**A. Customer Privacy.** Except as provided in Sections VI and VII below, HLP shall not disclose any Customer Personal Information to any person or entity without the customer's prior consent or approval.

**B. List of the Customer Personal Information the Utility Collects.** HLP shall make available to customers a summary or listing of the types of Customer Personal Information that is collected by regularly updating Appendix A of this Privacy Policy. This summary or listing shall be updated at regular intervals to reflect changes in technology or Customer Personal Information collection practices.

**C. Customer Right to Review and Correct Customer Personal Information.** HLP provides opportunities for customers to review and correct/update their Customer Personal Information. If customers have registered for an online account, customers may access and edit the Customer Personal Information by accessing their online customer account on the site. Otherwise, customers may request to review and correct their Customer Personal Information at any time by contacting Heber Light & Powers' Customer Service Division by telephone at (435) 654-1581 or by email at [customerservicesupport@heberpower.com](mailto:customerservicesupport@heberpower.com) or in person at 31 S 100 W, Heber City, UT 84032. Due to the confidentiality of certain Customer Personal Information, certain updates may be required to be made in person.

HLP will make billing interval meter data available to the customer on the SmartHub online portal after it has been collected and verified.

**D. Customer Right to Share or Disclose Customer Personal Information.** In addition to this Policy, requests and disclosure practices involving customer account information are governed by HLP's Customer Services Policies. Except as set forth in this Privacy Policy, Customer Personal Information (such as account information) is ordinarily shared only with the person or persons listed on the account.

Customers have the option to share their own Customer Personal Information (Personal Usage and Billing Information) with third parties (e.g. service providers that facilitate compatible devices, technologies, and appliances that augment the visibility, understanding, and control of electricity consumption.) HLP shall implement procedures for allowing customers to share such information when administratively practical, including electronic copies of their Customer Personal Information.

Whenever a customer requests their Customer Personal Information (Personal Usage and Billing Information) be provided to a Third Party, whether electronically or in writing, HLP may require that the customer document acknowledgement that the Customer is solely responsible for the information that they disclose to a Third Party and that HLP is not responsible for any use the Third Party makes of such information.

## V. How the Company Uses and Safeguards Customer Personal Information

**A. Utility Use of Customer Personal Information.** Generally, HLP uses Customer Personal Information to authenticate and administer customer accounts and information and manage and improve our services and business operations. Appendix A provides specific examples of how the Company collects and uses Customer Personal Information.

Heber Light & Power may release Customer Personal Information without prior customer consent when necessary to perform and protect lawful utility business functions. HLP reserves the right to disclose or share Customer Personal Information with third parties as needed (1) to initiate and render utility services; (2) to bill and collect funds owing to the Company; (3) to protect HLP, our customers, or the public from fraudulent, abusive, or unlawful use of our services or websites; (4) to comply with legal processes or applicable law; (5) to respond to any claims; or (6) to protect the rights, property, or safety of the Company, our employees, our customers, or the public.

**B. Safeguards Related to Utility Use of Customer Personal Information.** HLP has implemented appropriate administrative, physical, technical, and logical safeguards to protect the confidentiality, integrity, and availability of the Customer Personal Information we collect. These safeguards are designed to prevent loss, theft, misuse, unauthorized access, disclosure, alteration, or destruction of Customer Personal Information. Further, HLP has implemented measures to restrict access to Customer Personal Information to only those authorized employees who have a specific need to know such information.

For example, our customer information system has access controls designed to ensure that only those Company employees who have a business need to work with Customer Personal Information will have access to it, and they will have only the limited amount of access that they need to perform their jobs. When we request sensitive information (such as credit card number and/or social security number) on the website, we use encryption to protect it from unauthorized access while in transit.

Finally, we do not sell the Personal Usage and Billing Information of our Customers and, pursuant to this Privacy Policy, we will not sell that information for marketing purposes without express customer consent as outlined in Section VI or otherwise. We may insert marketing information into our retail electrical customer billing packages.

**C. Disclaimer.** Despite our security safeguards, however, we cannot guarantee that Customer Personal Information will be protected from interception, misappropriation, misuse, or alteration, or that it will not be disclosed or accessed by accidental circumstances or by unauthorized actions. We are required by law to notify customers if we become aware of a security breach that has the potential to affect Customer Personal Information.



## VI. Procedures and Safeguards Related to Company Disclosure of Customer Personal Information to Affiliates for Company Operations

**A. Aggregated Data.** HLP may disclose Aggregated Data (as Defined in Section I above) to manage, provide, and improve our services and business operations.

**B. Disclosure to Affiliates for Company Operations.** HLP may disclose Customer Personal Information to Affiliates, without Customer Consent so long as the disclosure is (1) lawful, (2) related to Company programs, operations, and functions that are necessary to our provision of reliable and cost-effective electrical service and (3) there is a written contract signed by the Affiliate that safeguards the disclosed information. Examples of such disclosures are detailed in Appendix A.

**C. Safeguards Related to Affiliate Disclosure.** To ensure that Customer Personal Information is safeguarded when disclosed to Affiliates where Customer Consent is not required, the Company will complete the following:

1. **Pre-Disclosure Review Procedure.** HLP shall complete the following steps to determine the necessity, scope, and timeline of the disclosure when it is determined that a Company department has a business or operational need to release Customer Personal Information. The department will:
  - a. Determine through appropriate review whether the law authorizes disclosure.
  - b. Identify a business purpose or business need for disclosure of Customer Personal Information.
  - c. Determine the amount or scope of information to be disclosed by questioning the purpose and need of the Affiliate to receive the information they are requesting.
  - d. Determine a specific timeline in which the Customer Personal Information will be used by the Affiliate and a scope that defines the manner in which the information will be used.
  - e. Complete the “Release of Customer Personal Information Agreement Checklist” in Attachment #3. This form must be approved by the Records Officer only after validating (1) the identified business purpose or need and (2) that the request to disclose is appropriate and needed. Approval is required only for the initial disclosure determination.
  - f. In all cases of the release of Customer Personal Information, execution of a written contract is required with conditions to govern Affiliate use of the information released.
2. **Non-Disclosure Obligation.** Any Affiliate receiving Customer Personal Information must execute a non-disclosure agreement or a contract that contains non-disclosure requirements. Such non-disclosure agreements or contracts shall include provisions that include consumer data safeguards, such as express prohibitions against: (i) selling the data for any purpose; (ii) using the data for marketing related to secondary purposes (defined below), and (iii) further disclosure to anyone not under a similar contract with HLP without the permission of the Company.

Before disclosing any Customer Personal Information to an Affiliate, HLP shall require the Affiliate to certify in writing that they have read, understand, and will comply with all requirements of this Privacy Policy in the same manner as if they were employees of the Company. As a precondition to disclosure, all such Affiliates shall sign a non-disclosure

agreement that specifically provides that HLP Customers are intended additional beneficiaries of the non-disclosure agreement.

- 3. Transmittal of Customer Personal Information to Affiliates.** All files and forms of Customer Personal Information we provide to an Affiliate must be sent via secure FTP, encrypted, or by an alternate secured method to protect the information. Email or hard copies should not be used to share Customer Personal Information with Affiliate.

## VII. Disclosures Required by Law

To the fullest extent allowable by law, HLP will comply with all obligations to provide information, including Customer Personal Information to the public, law enforcement, or other agencies as directed by law and/or the courts.

**A. Utah State Public Records Act:** HLP is subject to the disclosure requirements of Chapter 2 of Title 63G of the Utah Code. Per the Public Records Act, HLP is required to disclose all requested non-exempt records held or used by the Company. However, the Public Records Act does provide for some exemptions to disclosure. Such exemptions include Customer addresses, contact information, birthdates, social security numbers, credit card and bank information, account information, and utility usage and billing information in increments smaller than a billing cycle. We will take all reasonable efforts as detailed in this policy to safeguard information that is exempt from disclosure.

**B. Law Enforcement, Legal Process, and Agency Requests:** HLP shall comply with requests for Customer Personal Information when such information is demanded through valid legal process. Examples of required disclosure of Customer Personal Information include, but are not limited to, requests by (i) local, state, and federal law enforcement agencies conducting criminal investigations and made under the Public Records Act or in the form of a subpoena, search warrant, or other court order; (ii) energy and utility regulatory agencies; and/or (iii) state and other government auditors. These requests may require the release of Customer Personal Information involving current and/or former customers.

## VIII. Disclosures for Marketing

Heber Light & Power does not sell Customer Personal Information which includes Personal Usage and Billing Information for any purpose. Further, as described in this Section, HLP will not disclose or use Customer Personal Information for marketing or product offering purposes without first obtaining Customer Consent. From time to time, HLP may insert marketing information into our retail electrical customer billing packages.

Customer Consent is required for use or disclosure of Customer Personal Information for marketing and/or product offering a customer does not already subscribe to. Customer Consent is required before the release of Customer Personal Information in response to the following requests:

- From an Affiliate asking for Customer Personal Information for their own marketing purposes
- From Company staff working with an Affiliate to market a new product or service
- To promote marketing of services and products that are not directly related to the conduct of Company business operations.

**Customer Consent.** “Customer Consent” means an affirmative act of a customer consenting to or otherwise permitting the Company and/or an Affiliate to disclose Customer Personal Information. Such consent may be in writing using a standardized Customer Consent form and/or by accepting the terms and conditions stated on the Heber Light & Power website or online application forms.

- HLP will require affirmative Customer Consent for each instance of the release of Customer Personal Information for Marketing Purposes. Attachment #1 to this policy allows for Customers to provide consent. HLP will keep a record for each instance that the Customer has given written or electronic consent, following applicable records retention guidelines.

**Customer Revocation of Consent.** Subject to agreements with Affiliates, a customer has the right to revoke, at any time, any previously granted authorization to transfer Customer Personal Information to an Affiliate. Such revocation may be in writing using a standardized Customer Consent form and/or by rejecting the terms and conditions stated on the Heber Light & Power website or in online application forms. Attachment #2 to this policy allows for customers to revoke consent. Upon receipt of revocation from a customer, HLP shall have a reasonable period of time, not to exceed one full billing cycle, to cease further disclosure of that customer’s Customer Personal Information.

## **IX. Customer Complaints**

### **A. How to make a complaint about disclosure of Personal Information**

HLP will investigate complaints from customers whose Customer Personal Information may have been sold or disclosed by the Company or any of its Affiliates.

A customer who wishes to make such a complaint must provide a request for investigation in writing, signed by the customer or by someone with the legal authority to act on the customer's behalf. Each such request shall include a short and plain statement of the circumstances and the information he or she believes was disclosed. The written request must be delivered to the Company located at the following address:

Customer Service Division  
Heber Light & Power Company  
31 S 100 W  
Heber City, UT 84032

**B. Customer Complaint Review.** Upon receipt of a complaint, the Privacy Officer, or their designee, shall promptly investigate the complaint, including review of business records and practices pertinent to any disclosure of Customer Personal Information in violation of this Privacy Policy. Upon completing the investigation, a written response will be provided to the customer. Absent exceptional circumstances, a response will be provided within 30 days of receipt of the complaint.

The customer may subsequently make a request for a discretionary independent hearing using Heber Light & Power Company Appeals Process, which is described in Attachment # 4 to this Privacy Policy.

# Appendix A

## Information Heber Light & Power Company Collects and Uses

1. Heber Light & Power may request and collect Customer Personal Information under several circumstances related to its utility operations. The list below is not comprehensive but is an attempt to provide you with a reasonably complete list of the information the Company may collect in relation to its operations, programs, and services:

**Utility Account.** To establish a utility account, we will require certain PII such as the customer's name, address, telephone number, birthdate, email address, and identity verification as further detailed below.

**Online Account Registration.** Account registration is also required to access some features and services on our website. During the registration process, we may ask a customer for PII to verify the customer's identity, establish customer account(s), promote security, and to provide appropriate access to features.

**Online Customer and Energy Service Features / Online Rebate Applications.** Customers who use online features or applications for conservation or rebate programs may be asked for their address, account number, location, and other information during the use of some online features or forms.

**Identity Theft Prevention Program.** As part of our identity theft prevention program required by law, the Company uses the last 4 social security numbers or other valid, government issued picture identification to validate the identity of residential customers who open accounts online or over the telephone.

**Company Discount Rate, Energy Assistance, Energy Efficiency and Conservation Programs.** HLP may collect PII to evaluate or process applications for our discount rate and energy assistance programs. PII collected may include information from consumer reporting agencies, information from customers to verify employment or income, or other customer supplied PII collected as part of the application process.

**Affiliates.** HLP contracts with Affiliates for rate setting, billing and accounting purposes.

**Surveys, Contests and Promotions.** HLP may offer voluntary surveys, contests, and other promotions. To participate, customers may be asked to provide PII including contact information such as name and addresses, and demographic information, such as ZIP codes, age, and income.

**Co-Branded Web Pages.** HLP's website includes certain co-branded pages. A co-branded page provides a link to the website of one of our Affiliates. The linked website may ask for contact, demographic, energy use, and other information from customers.

**Smart Meter Data.** Advanced Metering Infrastructure (AMI) enables the collection and reporting of granular data about energy usage and demand ("Advanced Meter Data").

2. Heber Light & Power may use Customer Personal Information in a variety of ways. The list below is not comprehensive but is an attempt to provide you with a reasonably complete list of the ways the Company may utilize Customer Personal Information in its operations, programs, and services:

- To ensure accurate and timely billing. This includes but is not limited to communicating with customers about their billings, accounts, energy usage, water usage and payments.
- To provide customers with products and services they have requested from the Company.
- To obtain customer satisfaction data.
- To collect outstanding utility charges in the sale, acquisition, merger, or lease of business assets or property, and other transfers of control or management of business operations. Such disclosure may also be needed in the event of insolvency, bankruptcy, or receivership proceedings.
- To administer contests or other promotions in which customers are voluntary participants.
- To maintain or operate a safe and reliable electric system.

3. Reasons Customer personal Information may be disclosed to Affiliates:

- To maintain or operate our safe and reliable electric system or grid operations.
- To plan, implement, or evaluate energy use programs, such as energy management, or demand response.
- As part of Low-Income and other discount rates or payment assistance programs, such as to other public agencies for eligibility evaluations.
- In furtherance of Company program education and/or customer participation.
- To provide contracted services in relation to the Company uses specified in above sections.

# Attachment # 1

## CUSTOMER AUTHORIZATION TO RELEASE INFORMATION

FOR NON-UTILITY BUSINESS PURPOSES

This consent form will allow Heber Light & Power Company to release Customer Personal Information to a Third Party (as defined in the Company's Privacy Policy) or Affiliate. The customer must complete this document in its entirety and must be listed as a customer of record of the Company. HLP must verify that that the individual providing consent matches the name, service address and account number of the customer of record in the Company's customer information system.

### CUSTOMER INFORMATION:

Account Number: \_\_\_\_\_

Name on Account: \_\_\_\_\_

Name of Customer/Representative (if a business): \_\_\_\_\_

Service Address: \_\_\_\_\_

Telephone Number: (\_\_\_\_) \_\_\_\_ - \_\_\_\_\_

Email Address: \_\_\_\_\_

**AUTHORIZATION:** I authorize the release of my Personal Information (as defined in the HLP Privacy Policy) as follows:

Type of information to be released (i.e. usage or payment history, payment, contact information, etc...)

\_\_\_\_\_

Period which the information covers: \_\_\_\_\_

Name of recipient/business receiving information: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone number or contact information: \_\_\_\_\_

Manner in which information is to be provided (mail, email, pickup, etc...): \_\_\_\_\_

Date(s) for which this release is in effect: \_\_\_\_\_



**RELEASE:**

This consent for information release is at the request of, and on behalf of the customer listed above. Therefore, the customer agrees to release and hold harmless the Company from any liability, claims, demands, causes of action, damages or expenses resulting from: 1) any release of information to the recipient authorized above; (2) the unauthorized use of such information by the recipient; and (3) any actions taken by the recipient with respect to such information.

Account holder signature: \_\_\_\_\_ Date: \_\_\_\_\_  
(or Authorized Representative with documentation on file of Authorized Representative status)

By my signature above, I attest under penalty of perjury that I am the account holder or am the Authorized Representative of the account holder and authorize the release of information set forth above.

## Attachment # 2

### CUSTOMER REVOCATION OF AUTHORIZATION TO RELEASE INFORMATION

FOR NON-UTILITY BUSINESS PURPOSES

This form will revoke the release of previously authorized Customer Personal Information to a Third Party (as defined in the Company's Privacy Policy) or Affiliate. The Customer must complete this document in its entirety and must be listed as a customer of record of the Company. HLP must verify that that the individual providing revocation matches the name, service address and account number of the customer of record in the Company's customer information system.

#### CUSTOMER INFORMATION:

Account Number: \_\_\_\_\_

Name on Account: \_\_\_\_\_

Name of Customer/Representative (if a business): \_\_\_\_\_

Service Address: \_\_\_\_\_

Telephone Number: (\_\_\_\_) \_\_\_\_ - \_\_\_\_\_

Email Address: \_\_\_\_\_

**REVOCATION OF AUTHORIZATION:** I no longer authorize the release of my Personal Information (as defined in the HLP Privacy Policy) as follows:

Type of information previously released (i.e. usage or payment history, payment, contact information, etc...)

\_\_\_\_\_

Period which the information covers: \_\_\_\_\_

Name of recipient/business receiving information: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone number or contact information: \_\_\_\_\_

Manner in which information is to be provided (mail, email, pickup, etc...): \_\_\_\_\_

Date(s) for which this release is in effect: \_\_\_\_\_

**REVOCAION OF RELEASE:**

I acknowledge that I am revoking my previous authorization to provide Customer Personal information to the recipient listed above.

Account holder signature: \_\_\_\_\_ Date: \_\_\_\_\_

(or Authorized Representative with documentation on file of Authorized Representative status)

By my signature above, I attest under penalty of perjury that I am the account holder or am the Authorized Representative of the account holder and authorize the revocation of release of information set forth above.

# Attachment # 3

## RELEASE OF CUSTOMER PERSONAL INFORMATION CHECKLIST

(Routed with Contract)

It is the Company's policy to implement strong customer data privacy protections to maintain the trust of our customers. The sharing of Customer Personal Information with an Affiliate should occur only when it is necessary for the conduct of essential business functions.

Before any such customer information may be shared with an Affiliate this checklist will be completed, signed and an explanation of the business need to release the customer data will be attached.

The following Customer Personal Information will be shared with \_\_\_\_\_  
(Vendor Name)

(Check all that apply):

1. \_\_\_\_\_ Names
2. \_\_\_\_\_ Street Addresses
3. \_\_\_\_\_ Telephone Numbers
4. \_\_\_\_\_ Email Addresses
5. \_\_\_\_\_ Social Security Numbers
6. \_\_\_\_\_ Utility Account Numbers
7. \_\_\_\_\_ Utility Account Balances
8. \_\_\_\_\_ Bank Accounts and/or Credit Card Numbers
9. \_\_\_\_\_ Information received during the customer identity and credit worthiness process
10. \_\_\_\_\_ Personal identity information provided such as driver's license number
11. \_\_\_\_\_ Meter interval/usage use data that can be tied to items # 1-8 above
12. \_\_\_\_\_ Other Customer Personal Information (describe below)

A Department Manager's signature will serve as acknowledgement that they are familiar with both the Company Privacy Policy and the definition of Customer Personal Information as defined in the Policy. The signing manager is responsible for evaluating the validity of the data sharing request and for limiting the amount of Customer Personal Information shared with the Affiliate to that which is minimally necessary to meet the business objective. In addition, the signing manager acknowledges that they have confirmed that the data will be used in compliance with the restrictions outlined in the Company Privacy Policy.

A non-disclosure agreement is required to be signed by the Affiliate before the Customer Personal Information is provided to the Affiliate and should be included with the Affiliate Contract.

Department Manager: \_\_\_\_\_ Date: \_\_\_\_\_

Title: \_\_\_\_\_

# **Attachment # 4**

## **APPEALS PROCESS**

### **Review of Complaint Regarding the Release of Customer Personal Information in violation of Heber Light & Power's Customer Privacy Policy:**

Heber Light & Power Customers have the right to appeal the release of their Customer Personal Information (as defined in the Company Privacy Policy) unless that release is required by law.

A Customer shall utilize the following steps to exercise the appeals process:

1. The Company must receive a customer's written appeal by personal delivery or mail and shall be addressed to HLP.
2. The appeal must contain a short, plain statement of the alleged violation of the Company Privacy Policy, the relief requested by the customer, and the customer's contact information for purposes of communications for the appeals process.
3. Upon receipt of an appeal, the customer will be contacted by the Company's Privacy Officer, and an informal conference will be held. The customer must be available to attend the informal conference by telephone, or in person at the discretion of the Privacy Officer, no later than two (2) business days after the receipt of the appeal by Heber Light & Power Company.
4. If the issue is resolved to the satisfaction of the customer, the appeals process is concluded.
5. If the situation remains unresolved, a Request for Hearing must be submitted within ten (10) business days following the informal conference. Thereafter an Appeals Hearing will be scheduled and held. The customer must be available to attend the Appeals Hearing within two (2) business days of the informal conference. The date and time of the Hearing shall be set after coordination with the Ombudsman's Office, and the customer will be provided with written notice of the date, time and place of the Hearing.
6. The General Manager will designate an individual to represent the Company in the Hearing.
7. The customer will be considered to have received the written determination of the Ombudsman three (3) business days after the date of postage, or on the same date if sent via email or hand delivered.