


# City of Palmdale Administrative Policy

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| <b>ADOPTED</b><br>June 30, 2022   | <b>REVISED</b>   |  |
| <b>PREPARED BY</b><br>FINANCE   | <b>POLICY APPLIES TO</b><br>ALL CITY DEPARTMENTS/DIVISIONS |  |
| <b>APPROVED BY</b><br> | <b>TS</b>  | <b>RONDA PEREZ, INTERIM CITY MANAGER</b> |

## PURPOSE

To establish a Protection of Confidential Information policy to protect confidential customer information of Energy for Palmdale's Independent Choice ("EPIC"), a Community Choice Aggregation.

## DEFINITIONS

1. Confidential Information – Information that is not considered public information including but not limited to social security number, taxpayer ID number, Southern California Edison ("SCE") or Energy for Palmdale's Independent Choice customer or service account information including customer name(s), service addresses, billing addresses, telephone numbers, email addresses, account numbers, and electricity usage.

## POLICY & PROCEDURES

### Policy:

To ensure that all employees protect the integrity of the City's confidential information as well as the confidentiality of others, confidential information may not be shared with unauthorized individuals within or outside of the organization and may not be transmitted via email, except where reasonably necessary to conduct Energy for Palmdale's Independent Choice business or provide services to customers as required by the California Public Utilities Commission ("CPUC").

### Procedure:

1. Confidential information cannot be transmitted or forwarded to individuals within or outside of the organization who do not have an authorized need to know the information.

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2. Confidential information cannot be transmitted via email.
3. Confidential information cannot be posted on the City's website.
4. Employees must lock his/her computer when leaving their computer.
5. Passwords may not be shared with any person and cannot be stored physically or digitally.
6. Documents containing confidential information must be secured at all times.
7. Documents containing confidential information must be shredded when destroyed when no longer used and as per the adopted retention schedule if applicable.
8. Employees are responsible for any action performed under their name and password.
9. Examples of reasonable necessary business purposes include but are not limited to when such disclosure is necessary to:
  - a. Comply with law, regulation, or court order;
  - b. Enable Energy for Palmdale's Independent Choice to provide service to its customers;
  - c. Collect unpaid bills;
  - d. Obtain and provide credit reporting information;
  - e. Resolve customer disputes or inquiries;
  - f. Communicate about demand response, energy efficiency, energy management and conservation programs; or
  - g. In situation of imminent threat to life or property.
10. Failure to comply with the provisions of this policy and procedure may result in discipline up to and including termination.