



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE

May 1, 2015

Docket Nos. M-2013-2341990  
M-2013-2341991  
M-2013-2341993  
M-2013-2341994

LAUREN M. LEPKOSKI  
COUNSEL FOR FIRSTENERGY SERVICE COMPANY  
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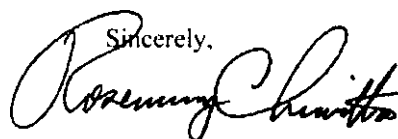
Re: Smart Meter Customer Privacy Policy for Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company

Dear Ms. Lepkoski:

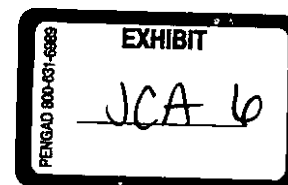
By Order entered June 5, 2014 (June 5 Order), the Commission modified and approved the Smart Meter Deployment Plan (SMP) and the final Communications Plan for Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company (collectively, FirstEnergy). The June 5 Order also directed FirstEnergy to file a Customer Privacy Policy before the wide-scale deployment of smart meters. FirstEnergy filed its final Smart Meter Customer Privacy Policy on March 18, 2015. No comments were filed by stakeholders or other parties.

Commission Staff has reviewed FirstEnergy's final Smart Meter Customer Privacy Policy Plan and found it appears to comply with the direction in the June 5 Order. However, this is without prejudice to any formal complaints timely filed against this policy plan.

If you have any questions in this matter, please contact David Washko, Bureau of Technical Utility Services, at 717-425-7401 or [dawashko@pa.gov](mailto:dawashko@pa.gov).

Sincerely,  


Rosemary Chiavetta  
Secretary



C-2018-3005907



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March 18, 2015

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

**Re: *Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company for Approval of Their Smart Meter Deployment Plan; Docket Nos. M-2013-2341990, M-2013-2341991, M-2013-2341993, and M-2013-2341994***

Dear Secretary Chiavetta:

Pursuant to the Pennsylvania Public Utility Commission's ("Commission") March 6, 2014 Order in the above-captioned proceeding, Metropolitan Edison Company ("Met-Ed"), Pennsylvania Electric Company ("Penelec"), Pennsylvania Power Company ("Penn Power"), and West Penn Power Company ("West Penn"), (collectively, the "Companies"), held a stakeholder meeting on August 6, 2014, to present a draft customer privacy policy regarding the protection of smart meter information. The Companies did not receive any feedback from the stakeholders regarding its draft customer privacy policy. Therefore, in accordance with the Commission's June 5, 2014 Order, the Companies are filing the attached Customer Privacy Policy before the wide-scale deployment of smart meters, which is scheduled to occur in 2016 in accordance with the Companies approved Smart Meter Deployment Plan.

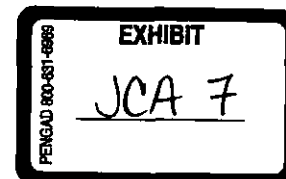
Please contact me if you have any questions regarding this matter.

Very truly yours,

Lauren M. Lepkoski

dln  
Enclosures

c: Per Certificate of Service  
Bureau of Technical Utility Services



**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Joint Petition of Metropolitan Edison</b>	<b>:</b>	<b>Docket Nos. M-2013-2341990</b>
<b>Company, Pennsylvania Electric Company,</b>	<b>:</b>	<b>M-2013-2341991</b>
<b>Pennsylvania Power Company and West</b>	<b>:</b>	<b>M-2013-2341993</b>
<b>Penn Power Company For Approval of</b>	<b>:</b>	<b>M-2013-2341994</b>
<b>Their Smart Meter Deployment Plan</b>	<b>:</b>	

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**CUSTOMER PRIVACY POLICY REGARDING  
PROTECTION OF SMART METER INFORMATION**

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FirstEnergy's Pennsylvania utilities -- Metropolitan Edison Company (Met-Ed), Pennsylvania Electric Company (Penelec), Pennsylvania Power Company (Penn Power) and West Penn Power Company (West Penn) (called the Companies) -- take the responsibility to protect the privacy and security of their customer's information very seriously and that commitment continues with the introduction of smart meters. In addition, the Companies place importance on the security and protection of all aspects of their electric system and associated sub-systems, including their Pennsylvania smart meter systems. This Customer Privacy Policy has been developed to describe how the Companies protect Sensitive Customer Information related to the use of smart meters.

Sensitive Customer Information includes -- but is not limited to -- the following:

- Name (contact name, company name, etc.)
- Address
- Interval Energy Usage Data
- Social Security Number
- Employer Identification Number
- Driver's License Number

- Date of Birth
- Credit Card Number
- Bank Account Information
- Government Passport Number

The Companies collect and retain Sensitive Customer Information that is reasonably necessary to serve their customers, effectively manage business operations, and meet regulatory and compliance obligations. The Companies do not sell or share any Sensitive Customer Information to third parties. In addition, they will not disclose a customer's information without prior consent, except as required by law, requested by regulatory agencies and governmental authorities, or for legitimate business purposes (such as credit evaluations). The Companies protect Sensitive Customer Information under current privacy protection laws, regardless of meter type.

Using internal and external audit processes, the Companies' systems are regularly evaluated to ensure that employees are able to access Sensitive Customer Information if necessary to perform their job and only on a need-to-know basis. All employees and contractors who have access to Sensitive Customer Information are required to maintain the confidentiality of that information and have received specialized training in the handling of such information.

No personally identifiable customer information – such as names and addresses, account numbers, credit/collection information or social security numbers – is stored in the Companies' smart meters or transmitted across the Companies' smart meter communication network. The Companies' smart meter communication network is a high security environment that uses multiple layers of protection from unwanted access – including the use of passwords, firewalls, continuous

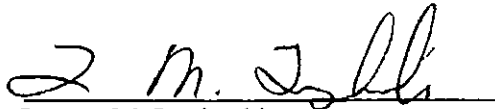
security monitoring and other security controls. In addition, usage data transmitted over the network is encrypted.

All systems and hardware are protected using nationally recognized protocols, controls and standards. Where vendors are involved, they are required to adhere to the Companies' security standards and advanced metering infrastructure guidelines published by the North American Energy Standards Board (NAES) and the National Institute of Standards and Technology (NIST).

The Companies will continue to monitor any privacy-related issues that may arise and will adjust their procedures and protocols as necessary in order to remain in compliance with any new requirements concerning customer privacy.

Respectfully submitted,

Dated: March 18, 2015



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Pennsylvania Electric Company,  
Pennsylvania Power Company and  
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