
(Continued from Sheet No. C-19.00)

22. DATA PRIVACY POLICY

Definition of Data Privacy Policy Terms

A. Types of Data:

- a. **"Customer Data"** means any combination of Personal Data, Customer Account Information, and Consumption Data.
 - i. **"Personal Data"** means information collected or known by the Company that merit special protection including the standard types of personal identification information used to establish an account. Personal Data is limited to name and address in conjunction with birth date, telephone number, electronic mail address, Social Security Number, financial account numbers, driver's license number, credit reporting information, bankruptcy or probate information, health information, network, or Internet protocol address.
 - ii. **"Consumption Data"** means customer specific electric usage data, or weather adjusted data, including but not limited to kW, kWh, voltage, var, power factor, and other information that is recorded by the electric meter for the Company and stored in its systems. Consumption Data also includes payment and service history, account number, and amount billed.
 - iii. **"Customer Account Information"** means personally identifiable information including Personal Data and Consumption Data. Customer Account Information also includes information received by the Company from the customer for purposes of participating in regulated utility programs, including, but not limited to bill pay assistance, shutoff protection, renewable energy, demand-side management, load management, or energy efficiency.
- b. **"Aggregated Data"** means any Customer Data the Company assembles and compiles into an aggregated data set from multiple individuals, residences, tenants or commercial buildings.
- c. **"Anonymized Data"** means any Customer Data, from which all identifying information has been removed so that the individual data or information of a customer cannot be associated with that customer without extraordinary effort.
- d. **"Weather Adjusted Data"** means electric consumption data for a given period that has been normalized using stated period's heating or cooling degree days.

B. **"Contractor"** means an entity or person performing a function or service under contract with or on behalf of the Company, including customer service, demand response, energy efficiency programs, payment assistance, payroll services, bill collection, or other functions related to providing electric service.

C. **"Customer"** means an account holder (at least 18 years old or an emancipated minor), corporation, municipality or other government agency, which has agreed, orally or otherwise, to pay for electric service from the Company.

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- D. **"Informed Customer Consent"** means, in the case where consent is required: (1) the Customer is provided with a clear statement of the data or information to be collected and allowable uses of that data or information by the party seeking consent; (2) the frequency of data or information release and the duration of time for which the consent is valid; and (3) process by which the Customer may revoke consent. In no case shall silence by the Customer ever be construed to mean express or implied consent to a request by the Company, or its Contractors. Customer consent shall be provided directly from the Customer and documented in writing, subject to forms and processes as defined by the Company.
- E. **"Primary Purpose"** means the collection, use, or disclosure of information collected by the Company or supplied by the Customer in order to: (1) provide, bill, or collect for, regulated electric service; (2) provide for system, grid, or operational needs; (3) provide services as required by state or federal law or as specifically authorized by an order of the Commission; (4) plan, implement, or evaluate programs, products or services related to energy assistance, demand response, energy management, energy efficiency, or renewable energy by the Company or under contract with the Company, under contract with the Commission, or as part of a Commission-authorized program conducted by an entity under the supervision of the Commission, or pursuant to state or federal statutes governing energy assistance; and (5) disclosure of customer name and address to a provider of appliance repair services in compliance with MCL 460.10a(9)(a), or to otherwise comply with the Code of Conduct.
- F. **"Secondary Purpose"** means any purpose that is not a Primary Purpose.
- G. **"Standard Usage Information"** means the usage data that is made generally available by the Company to all similarly situated Customers on a regular basis, delivered by the Company on the Company's website through a data portal, email or by US Mail.
- H. **"Third-party"** means a person or entity that has no contractual relationship with the Company to perform services or act on behalf of the Company.
- I. **"Written Consent"** means a signed form with the customer's signature received by the Company through mail, facsimile, or email. A customer may also digitally sign a form that is transmitted to the Company.

General Company Data Privacy Policy

The Company shall collect and manage Customer Data in providing utility service to its Customers. The Company shall take appropriate measures to protect this data in its possession against loss, theft, and unauthorized access. The Company shall not release Customer Data to Third Parties without Informed Customer Consent, with exception of those customers availing themselves to social service agencies. The Company may provide Customer Data to its Contractors; however, the Contractor must be contractually bound to maintain the confidentiality of the individual customer energy usage/billing data.

(Continued on Sheet No. C-22.00)

ISSUED FEBRUARY 10, 2020
BY TOBY L. THOMAS
PRESIDENT
FORT WAYNE, INDIANA

EFFECTIVE FOR SERVICE RENDERED ON
AND AFTER FEBRUARY 1, 2020

ISSUED UNDER AUTHORITY OF THE
MICHIGAN PUBLIC SERVICE COMMISSION
DATED JANUARY 23, 2020
IN CASE NO. U-20359

(Continued from Sheet No. C-21.00)

Collection and Use of Customer Data

1. The Company or its Contractor collects Customer Data as necessary to accomplish Primary Purposes.
2. The Company may collect and use Customer Data for Primary Purposes without Informed Customer Consent.
3. Informed Customer Consent is necessary before use or disclosure of Customer Account Information, Consumption Data, and Personal Data for Secondary Purposes.
4. The Company will not sell Customer Data unless the Company receives Informed Customer Consent or Commission consent, except in connection with sales of certain aged account receivables to collection firms for purposes of removing this liability from Company accounts.
5. The Customer may request that Consumption Data specific to the Customer be released to the Customer or a Third Party of the Customer's choice. Such requests may be made by calling the Company's Customer Operations Center at 1-800-311-6424 or by requesting such online at the Company's website www.indianamichiganpower.com. The Customer calling with the request must be listed on the Customer's account and be able to authenticate their identity.
6. The Company shall not release Customer Data to Third Parties without Informed Customer Consent. A written consent form can be obtained by calling the Company's Customer Operations Center, accessing the Company's website or following this [LINK](#). Once completed by the Customer, the written consent form can be submitted to the Company's Customer Service personnel by email at info@release@aep.com, fax at 1-800-281-3916 or U.S. mail. The written consent form will be activated for use by the Company on the first business day following receipt of the form. Once the Company receives Informed Customer Consent from the Customer, the Company is not responsible for loss, theft, alteration, or misuse of the data by Third Parties or Customers after the information has been transferred to the Customer or the Customer's designated Third Party.

Disclosure without Informed Customer Consent

1. The Company shall disclose Customer Data when required by law or Commission rules. This includes law enforcement requests supported by warrants or court orders, and judicially enforceable subpoenas. The provision of such information will be reasonably limited to the amount authorized by law or reasonably necessary to fulfill a request compelled by law.
2. The Company may disclose Customer Data in the context of a business transaction such as an asset sale or merger to the extent permitted by law.
3. Informed Customer Consent is not required for the disclosure of customer name and address to a provider of a value-added program or service, regardless of whether that provider is a utility affiliate or other entity within the corporate structure, or to a value-added program or service competitor, in compliance with MCL 460.10ee(10)(a) and Mich Admin Code, R 460.10109(2).

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ISSUED AUGUST 19, 2020
BY TOBY L. THOMAS
PRESIDENT
FORT WAYNE, INDIANA

EFFECTIVE FOR BILLS RENDERED BEGINNING
WITH THE BILLING MONTH OF SEPTEMBER 2020

ISSUED UNDER AUTHORITY OF THE
MICHIGAN PUBLIC SERVICE COMMISSION
DATED JULY 9, 2020
IN CASE NO. U-18485

(Continued from Sheet No. C-22.00)

4. Informed Customer Consent is not required for the Company's disclosure of Aggregated or Anonymized Data. T

Disclosure to Contractors

1. The Company shares Customer Data with the Company's Contractors working on behalf of the Company for Primary Purposes only, without obtaining Informed Customer Consent.
2. Contracts between the Company and its Contractors specify that all Contractors are held to the same confidentiality and privacy standards as the Company, its employees, and its operations. These contracts also prohibit Contractors from using any information supplied by the Company for any purpose not defined in the applicable contract.
3. The Company requires its Contractors who maintain Customer Data to implement and maintain reasonable data security procedures and practices appropriate to the private nature of the information received. These data security procedures and practices shall be designed to protect the Customer Data from unauthorized access, destruction, use, modification, or disclosure. The data security procedures and practices adopted by the Contractor shall meet or exceed the data privacy and security policies and procedures used by the Company to protect Customer Data.

**ISSUED AUGUST 19, 2020
BY TOBY L. THOMAS
PRESIDENT
FORT WAYNE, INDIANA**

**EFFECTIVE FOR BILLS RENDERED BEGINNING
WITH THE BILLING MONTH OF SEPTEMBER 2020**

**ISSUED UNDER AUTHORITY OF THE
MICHIGAN PUBLIC SERVICE COMMISSION
DATED JULY 9, 2020
IN CASE NO. U-18485**