

1 **Q. In reference to the evidence of Earl Ludlow, page 54, line 12, please provide**
2 **information as to what privacy measures the Company has in place to ensure**
3 **customer confidentiality.**
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5 A. It is the policy of Newfoundland Power to protect the privacy of customers by limiting
6 access to personal customer information to the customer who provided the information,
7 to third parties who are legitimately authorized to access the information, and to
8 employees who require the information in the course of their employment duties.
9

10 Current measures taken by Newfoundland Power to ensure the confidentiality of
11 customer account information include:

- 12 • Confirming the identity of a customer who contacts the Company by telephone before
13 discussing the customer's account and by following a practice of non-disclosure if
14 there are any doubts regarding the customer's identity;
- 15 • Maintaining password protection on the Company's customer database;
- 16 • Limiting access to the customer database to those employees who require the
17 information in the course of their employment;
- 18 • Following industry standard encryption practices for account information that is made
19 available via the Company's website;
- 20 • Requiring the written permission of a customer, or a search warrant or court order
21 prior to disclosing account information to a third party;
- 22 • Shredding customer records that are no longer required for business purposes; and
23 • Ensuring secure storage of all customer records.
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25 In April 2000, the Government of Canada enacted the *Personal Information Protection*
26 *and Electronic Documents Act* ("PIPEDA"). PIPEDA is intended to govern the
27 collection, use and protection of personal information regarding individuals that is
28 collected by Canadian businesses. Effective January 1, 2004, this legislation will apply
29 to Newfoundland Power, unless the provincial government passes similar legislation
30 before that time.
31

32 Newfoundland Power has established a working group to develop recommendations for
33 the implementation of policies, controls and procedures that will ensure Newfoundland
34 Power complies fully with PIPEDA before the end of 2003.