

Docket Number: NG16-012
Subject Matter: First Data Request
Request To: NorthWestern Corporation dba NorthWestern Energy
Request From: South Dakota Public Utilities Commission Staff
Date of Request: October 18, 2016
Responses Due: November 1, 2016

1-1) In Section 5, Sheet No. 8.1, under the Data Protection and Security section, NorthWestern Energy states "The Company shall terminate, within a reasonable period of time, a Third Party's right to access future Meter Data ...". Please provide NorthWestern Energy's definition of "a reasonable period of time" in this statement.

NorthWestern will terminate a Third Party's right to access future Meter Data within 3 business days of receiving the customer request.

For natural gas transportation customers, a signed customer release form is kept in the customer's file until such time as we are notified by the customer that their selection of a marketer has changed.

1-2) Please refer to the definition of Meter Data on Section 5, Sheet No. 8.

a) Has NorthWestern Energy installed any digital meters with two-way communication capabilities? Please explain.

Yes, NorthWestern Energy has digital meters that have the capability for two-way communication in South Dakota. These meters are able to communicate with meters in our Command Center. For example, we are able to reset demand meters on a monthly basis through the use of these meters. However, we typically only use the meters for one-way communications to send a meter read from the customer location to our Command Center for monthly billings. Readings from these meters are for customer usage at the meter only. We do not collect customer data from behind the meter with this technology.

For natural gas transportation customers, NorthWestern collects daily usage through digital meters which it provides to the customer and their 3rd party natural gas supplier.

b) Does NorthWestern Energy collect any data that is generated from sources behind the meter? Please explain.

No- NorthWestern Energy does not collect metering data from sources behind the meter. However, through NorthWestern's energy efficiency program efforts, information about types of energy use is gathered (i.e. type of space or water heat, appliance type/age/size/number, lighting types, etc.) and an approximate bill disaggregation of the various uses is developed for the individual customer based upon their energy usage history and the survey completed during the audit. Information is collected from additional customers when those customers submit rebates applications—high efficiency furnace, programmable thermostats, etc.

NorthWestern does not collect any data related to natural gas transportation customers from behind the meter.

Docket Number: NG16-012
Subject Matter: First Data Request
Request To: NorthWestern Corporation dba Northwestern Energy
Request From: South Dakota Public Utilities Commission Staff
Date of Request: October 18, 2016
Responses Due: November 1, 2016

- c) Does NorthWestern Energy believe that data that is generated from sources behind the meter is covered by the privacy policy? Please explain and specify which section of the tariff explicitly identifies this data is covered by the policy.

Yes. Please see the Data Access and Sharing language contained in Section 5, Sheet 8.1 where the tariff specifically references the policy and its application to the protection of customer meter data within the tariff.

- 1-3) Please refer to the Data Retention content in Section 5, Sheet No. 8.1. Please provide NorthWestern Energy's definition of "reasonable period" in the first sentence and "a reasonable period of time" in the second sentence.

NorthWestern retains data it collects for a period of seven years in the first sentence and three years for the second sentence.

For natural gas transportation customers, please see the response to DR 1-1) above.

- 1-4) Please provide the Customer/Account Master File Privacy Policy referenced under the Data Access and Sharing in Section No. 5, Sheet No. 8.1.

Please see Attachment A to this response.

- 1-5) Does NorthWestern intend to release aggregated data for multiple Customers? Please explain.

For purposes of LIHEAP, it is a federal requirement to provide aggregated customer data to the applicable state agency. The information provided includes customer account numbers and customer usage (in units and dollars) but no personally identifiable customer information is submitted.

NorthWestern would only release individual customer information on an aggregated basis when it has signed releases from each customer to do so.

- 1-6) Please resubmit the clean tariff sheets in compliance with ARSD 20:10:13:04 and 20:10:13:28.

Please treat the Redlined version of the tariff sheets submitted in the filing as the clean tariff version for approval purposes.

- 1-7) Has any Third Party requested Customer meter data in the past five years? If yes, please provide the entity and the data type requested.

For purposes of responding to this question, NorthWestern understands that the Commission is interested in knowing if the company has been contacted by outside Third Party interests, such companies that are not in a contractual working relationship with NorthWestern, for customer meter data. We are not aware of any such contacts to the company for that information.

Docket Number: NG16-012
Subject Matter: First Data Request
Request To: NorthWestern Corporation dba Northwestern Energy
Request From: South Dakota Public Utilities Commission Staff
Date of Request: October 18, 2016
Responses Due: November 1, 2016

NorthWestern would not release that type of information to those entities without customer consent as described in the proposed tariff.