GLENDALE WATER & POWER PRIVACY POLICY

Glendale Water & Power (GWP) is committed to ensuring the privacy of our customers. GWP complies with all applicable laws concerning customer privacy and the use, maintenance, storage and destruction of personal information concerning GWP's customers, whether or not the personal information is obtained via telephone, in person, online, or through the use of smart grid technology.

This privacy policy is effective March 1, 2012. GWP may periodically update this privacy policy. Any updates to the privacy policy will be posted on the GWP website.

What types of information do we collect:
When a customer signs up for utility service, maintains a utility account with GWP, or participates in a utility program, the customer may provide various types of Personal Information and other information to GWP. GWP has collected and maintained customer information necessary to provide electric and water service since it started billing customers. This type of information includes:

> General contact information that allows us to communicate with our customers: Name, address, telephone numbers and email addresses;
> Billing and credit information: payment dates, credit history, Social Security Number and Drivers License Number.
> Electric and/or water usage data gathered by our metering systems.

What type of information is considered confidential?
GWP considers Personal Information to be confidential. Personal Information, as used in this policy, is a customer's first and last name, together with any of the following: (1) physical or home address; (2) email address; (3) telephone number; (4) social security number; (5) drivers license number or state identification card number; (6) utility usage data; (7) financial information such as credit history, billing information, or financial documentation used to establish eligibility for service or GWP programs; (8) medical information as may be provided for GWP's Guardian program; or (9) information that a customer provides when he or she transacts with GWP online and that is maintained in a personally identifiable form.

Utility Usage Data
Utility usage information is one category of Personal Information that is collected by GWP via a customer's meter. This information is used to bill customers for services and to manage and plan for energy and water supply, demand and usage. All customers with the new electric and water meters have secure access to their electricity and water usage data via GWP's website or by contacting GWP Customer Service at (818)548-3300. In addition, to usage information, customers will also have secure access to their pricing information, including an estimate of their month-end bill and rate information.

GLENDALE WATER & POWER PRIVACY POLICY

Electronic Communications and E-mail addresses
When a customer participates in online bill pay, maintains a GWP online account, signs up for the Citizen Notification System, or otherwise submits an electronic inquiry to GWP, that customer provides us with an email address. When a customer provides an email address to us, we may use it to communicate with that customer regarding GWP matters. This may include emails regarding that customer's account, utility news, responses to inquiries made by the customer, or invitations to participate in GWP programs.

In some cases, GWP contracts with service providers to assist us by communicating with customers regarding GWP programs. GWP may provide our customers' email addresses to service providers with whom GWP has contracted to assist GWP with such programs. GWP will send customers an electronic notice and provide customers with the opportunity to opt out of receiving electronic communications from GWP service providers. Unless a customer opts out, he or she may receive electronic communications from GWP service providers that administer GWP programs on GWP's behalf. The use of customers' email addresses by GWP or its service providers is strictly limited to communications relevant to providing the customer with GWP utility service and the customer's utility usage information. Customer email addresses are never sold, never provided to other customers, and may not be used for marketing unrelated to GWP service, or for any commercial purposes.

If a customer does not wish to receive correspondence from GWP and/or GWP service providers via email, he or she may opt out of electronic notifications by clicking on the "unsubscribe" button on the email or by otherwise following the opt out instructions within the email. Any time a customer receives an email from us, he or she will have the opportunity to opt out of future email communications.

Aggregated and Anonymous Data
GWP collects aggregated data regarding its customers, such as utility usage data, website usage patterns, and call center data, for analysis, reporting, or program management. This data allows us to manage our business operations and serve our customers most effectively. This data is maintained by GWP in a way that is anonymous and not linked to specific customers or to their Personal Information. Aggregated and anonymous data is not considered Personal Information.

Automatically-Generated Data
Some information is automatically generated whenever a customer accesses the GWP website, such as IP addresses and "cookies." An IP address is the number that is assigned automatically to an individual's computer every time he or she access the internet. Cookies are a text string stored on an individual's hard drive regarding that individual's preferences and web usage. This information is used to determine how many visitors view the GWP website and to make our website useful and relevant to our customers. Customers can turn off the cookie function and change their privacy preferences on their browser, but this may limit or affect the use of some of the GWP website applications. This information is not tied to any customer's Personal Information and is used in an

aggregate, anonymous form. Automatically-Generated Data is not considered Personal Information.

Links to Other Websites
Non-GWP websites may be linked into GWP's website. If a customer visits such websites, those websites may also record the customer's IP address and/or generate cookies. GWP has no control over the privacy policies or information collected by other websites. If a customer visits such sites, the customer is cautioned to check the privacy policies applicable to those sites.

How is Personal Information used by GWP?
Personal Information is used by GWP for GWP business purposes only. For example, Personal Information is used to open and maintain customer accounts, to provide and bill for utility services, and to determine eligibility and allow our customers to participate in GWP programs and incentives when customers apply for such programs. Personal Information may be used to provide our customers with information regarding GWP, such as conservation and public benefits programs, outages or emergencies.

Except under the limited circumstances described in this policy, GWP does not provide Personal Information concerning a customer to any third party without the customer's consent. GWP does not sell its customers' Personal Information to third parties or allow third parties to use Personal Information for their commercial benefit.

Who has access to Personal Information and for what purposes?
GWP uses Personal Information to provide and bill for utility services, to enable its customers to participate in GWP programs and to provide for system, grid or operational needs of the utility. GWP provides billing services for other City trash and sewer services and uses Personal Information (such as name, address and account number) to bill and collect payment for such services.

GWP will share Personal Information when we reasonably believes that such disclosure is required by law, such as in response to a subpoena, a warrant or other court order, or in connection with a criminal investigation. GWP may also disclose Personal Information to emergency responders in a situation involving an imminent threat to life or property.

GWP may also provide some categories of Personal Information to a limited number of designated employees of other City of Glendale departments where it is directly related to City business purposes.

GWP may receive a request for Personal Information under the California Public Records Act. Generally, Personal Information and utility usage data are not considered public records and will not be provided to anyone other than the GWP customer, except in limited circumstances described in the law or with the customer's express written consent. GWP will only disclose Personal Information to the extent authorized by that Act or as authorized by law.

GLENDALE WATER & POWER PRIVACY POLICY

The law allows GWP to provide Personal Information to service providers that have contracted with GWP to provide a service related to GWP's operation, such as for system, grid or operational needs, or the implementation of specific programs, such as demand response and conservation programs. The Personal Information provided to GWP's service providers is limited to that which is reasonably necessary to perform their functions for GWP. All such service providers are required to maintain the confidentiality of Personal Information and to maintain security procedures and practices to protect Personal Information from unauthorized access, destruction, use, modification or disclosure.

Customer access to Personal Information

GWP customers may access their Personal Information in several ways. Utility usage data and billing data is provided on the customer's utility bill and through the GWP website. A customer may request specific Personal Information regarding his or her own account by contacting GWP Customer Service at (818)548-3300 or by submitting a Public Records Act request to the City Clerk's office, which is located at 613 E. Broadway, Room 110, Glendale, CA 91206. Customers may not obtain Personal Information regarding another customer unless authorized by law. We will take reasonable steps to verify our customers' identity before granting access to Personal Information.

Can Customers share Personal Information with third parties?

Yes, Customers may share Personal Information, including utility usage data, with third parties. GWP customers should be aware that there are risks of sharing Personal Information with third parties. Once Personal Information is shared, it will become public and the customer may not be able to control its dissemination and use. Except as allowed by law and described in this policy, GWP will not make a customer's Personal Information available to a third party without a Customer's express written consent.

How we protect information from unauthorized access or disclosure.

The security of GWP customers' Personal Information is important to GWP. Except where disclosure is required by law or where a customer expressly consents to the disclosure of his or her Personal Information, GWP may only use the customer's Personal Information for GWP business purposes.

The disclosure of a customer's Personal Information is limited to those employees and service providers that have a business need for such information. All employees and contractors who have access to GWP customers' identifying information are required and trained to adhere to the GWP and City of Glendale FACT Act policy, which protects our customers from potential identity theft. Employees with access to GWP Customer Service Division information are required to sign a confidentiality agreement indicating that they understand their obligation and consequences of violating that obligation. Contractors are contractually obligated to maintain the confidentiality of Personal Information.

GLENDALE WATER & POWER PRIVACY POLICY

When a customer accesses GWP's online services, the customer's account and financial information is secured using industry standard firewalls and password protection systems. Customers are required to use a secure login to access their information and the latest password protection protocols and other security protections that prevent third parties from accessing Personal Information in GWP's billing system unless the customer affirmatively consents. GWP employs Secure Sockets Layer ("SSL") technology. This is an industry-standard method of protecting the confidentiality of Personal Information. The customer's browser must support SSLs in order for this to function.

What if there is a security breach?
If GWP become aware of a security breach, or has reasonable grounds to believe that a security breach may have occurred, and that any customer's Personal Information may have been compromised, we must promptly notify affected customers of the occurrence. We may delay notification to our customers if we reasonably believe it is necessary to do so in order to avoid compromising a criminal investigation. The notice will include the date or estimated date(s) of the occurrence, the types of Personal Information that we believe were the subject of the breach, the nature of the breach, to the extent we can identify it, and what we have done in response to the breach.

Children's privacy online.
GWP does not knowingly collect information from persons under the age of 18. However, certain portions of our website may contain educational and informational materials designed for children. We do not monitor the age of the users of our website. Anyone under the age of 18, should not submit any Personal Information on this website or any website without his or her parent's or guardian's consent.

Do customers need to provide GWP with Personal Information?
A GWP customer can decline to provide GWP with certain types of Personal Information. For example, customers are not required to provide GWP with an email address and do not need to interact with GWP online. However, without certain information, we cannot establish an account or provide the customer with utility service. Federal law requires that, for security reasons, we must obtain and verify Personal Information prior to opening any utility account. Some Personal Information is required in order to verify eligibility for and participate in certain GWP programs. For example, customers must provide financial information to establish eligibility for low income programs.

How can a customer correct inaccuracies in his or her Personal Information?
Unless prohibited by applicable state or federal law, rule or regulation, customers will be granted the ability to dispute the accuracy of their Personal Information and request corrections to their Personal Information. A customer may do so by contacting GWP Customer Service at (818)548-3300. Disputes regarding utility usage or the accuracy of the meter are governed by the Glendale Municipal Code and GWP regulations. For more information customers may contact GWP Customer Service. Questions regarding GWP utility bills should be directed to GWP Customer Service.

GLENDALE WATER & POWER PRIVACY POLICY

Contact for questions/ concerns/ complaints related to the GWP Privacy Policy. Any questions, concerns or complaints related to the GWP Privacy Policy should be addressed to:

Glendale Water & Power
Customer Service
141 N. Glendale Avenue, Level 2
Glendale, CA 91206
Telephone: (818) 548-3300
To communicate with us *via* email, go to:
http://www.GlendaleWaterAndPower.com/contact.aspx