

ILLINOIS COMMERCE COMMISSION
DOCKET NO. 13-0618
Utility Services of Illinois, Inc. et al.
Responses to Staff Data Requests DAS 4.01 through 4.04

- DAS-4.01 Regarding the Joint Applicants' response to Staff DR DAS-2.05a, please provide the following information.
- Did WSC ever endorse HomeServe or its products?
 - If yes, were HomeServe endorsement letters ever addressed to a specific UI customer? If so, please state during what period.
 - Provide all copies of endorsement letters, if any, that were used after December 2012.

Response:

- No
- N/A
- N/A

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OFFICIAL FILE

I.C.C. DOCKET NO. 13-0618
Utilities Inc. Staff Cross Exhibit No. 1

Witness Lubertozi

Date 5/7/14 Reporter LW

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- DAS-4.02 Regarding the Joint Applicants' response to Staff DR DAS-3.03,
- a. Did ratepayers ever sign a release, waiver or disclaimer for the use of confidential information?
 - b. Provide the privacy policy of UI.
 - c. Provide the privacy policy of WSC.
 - d. Provide the privacy policy of the Illinois Utilities and/or USI.

Response:

- a. No confidential information is used, so no release, waiver or disclaimer was requested.
- b. See response to (d) below.
- c. See response to (d) below.
- d. The Companies do not have written privacy policies pertaining to customer information. It is the policy of Utilities, Inc. and its affiliates not to disclose individual customer usage or credit information to third parties for non-utility purposes except as required by law or regulation.

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- DAS-4.03 Regarding the Joint Applicants' response to Staff DR DAS-3.05, which states "Yes. WSC inadvertently provided customer names to HomeServe from 2009 - 2011. WSC ceased providing customer names to HomeServe in December 2011." Regarding this response, please provide the following information:
- a. Were the names which were provided the account holder name?
 - b. Please provide a list of the names of all UI ratepayers in January-2009. If that information is not available, provide a list of the names of all current UI ratepayers.
 - c. Did WSC recover all customer names inadvertently provided to HomeServe? If yes, provide documentation. If no, explain why not.
 - d. Provide all correspondence between WSC, UI and HomeServe regarding the inadvertent provision of utility customer names to Home Serve.
 - e. Did WSC notify the Illinois Utilities regarding this inadvertent provision of the utilities customer names? If yes, please provide documentation. If no, explain why not.
 - f. Did either WSC or the Illinois Utilities notify the ratepayers regarding this inadvertent provision of customer names? If yes, provide documentation. If no, explain why not.

Response:

- a. Yes, although this request is unclear as to the difference between the meanings of account holder and customer.
- b. Please see attached list of Illinois ratepayers in January 2009
- c. No. WSC is determining if HomeServe can delete the information that it received and verify its deletion.
- d. WSC is still reviewing emails and documentation, but it appears that all communication was done via a conference call.
- e. No. The request is unclear as to how or why notice is necessary.
- f. No. Ratepayers were not notified because no ratepayer has requested notification.

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DAS-4.04 Have any current UI ratepayers been receiving service since before 1979?

Response: Unknown.

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