North American Energy Standards Board

Re: Comments on R10012, Retail Electric Quadrant Data Privacy Task Force on Third Party Access to Smart Meter-based Information

Ladies and Gentlemen:

This letter is to comment on behalf of the Sacramento Municipal Utility District (SMUD) in response to the request for comments of the North American Energy Standards Board (NAESB) Retail Electric Quadrant (REQ) Data Privacy Task Force recommendations on Third Party Access to Smart Meter-based Information. SMUD appreciates the task force's careful consideration of the issues surrounding consumer privacy and supports the task force's recommendations.

The Sacramento Municipal Utility District is a community owned electric utility governed by a seven-member Board of Directors. Serving 592,000 customers and a total population of about 1.4 million, SMUD is the sixth largest public utility in the country. SMUD's purpose is to provide solutions for meeting our customers' electrical energy needs. SMUD is responsible for the acquisition, generation, transmission, and distribution of electric power in its 900-square mile service territory in northern California, which includes virtually all of Sacramento County and small adjoining portions of Placer and Yolo County.

Between 2009 and 2012, SMUD will install more than 600,000 advanced two-way meters that will help customers use energy more efficiently. While the meters make good sense for SMUD because they will reduce operating costs and improve reliability, this technology will also provide the foundation for a new relationship between SMUD and its customers. The new technologies will allow customers to make energy choices based on cost, comfort, and convenience. The value comes not from the actual meters, but from the increased information and capability the technology will provide customers.

SMUD recognizes that with the increased information capabilities, privacy implications are a concern for customers and welcomes the collaborative process of the NAESB in formulating model business practices on Third Party Access to Smart Meter-based Information. These model business practices offer helpful guidance on
protecting consumer privacy, while balancing a utility's operational requirements and cost. SMUD thanks the NAESB, participating entities, and interested parties for their time, comments, and insight.

Sincerely,

[Signature]

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Cc: Corporate Files