

REDACTED

080061-EI

Exhibit B

REDACTED

CMP 1
COM _____
CTR _____
ECR _____
GCL _____
OPC _____
RCA _____
SCR _____
SGA _____
SEC _____
OTH _____

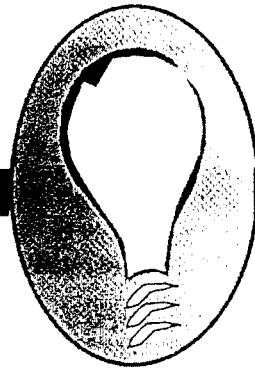
DOCUMENT NUMBER-DATE

10870 DEC 12 6

FPSC-COMMISSION CLERK

Redacted

NOVEMBER 2007



REVIEW OF

Customer Data
Security
OF
Florida's Five
Investor-Owned
Electric Utilities

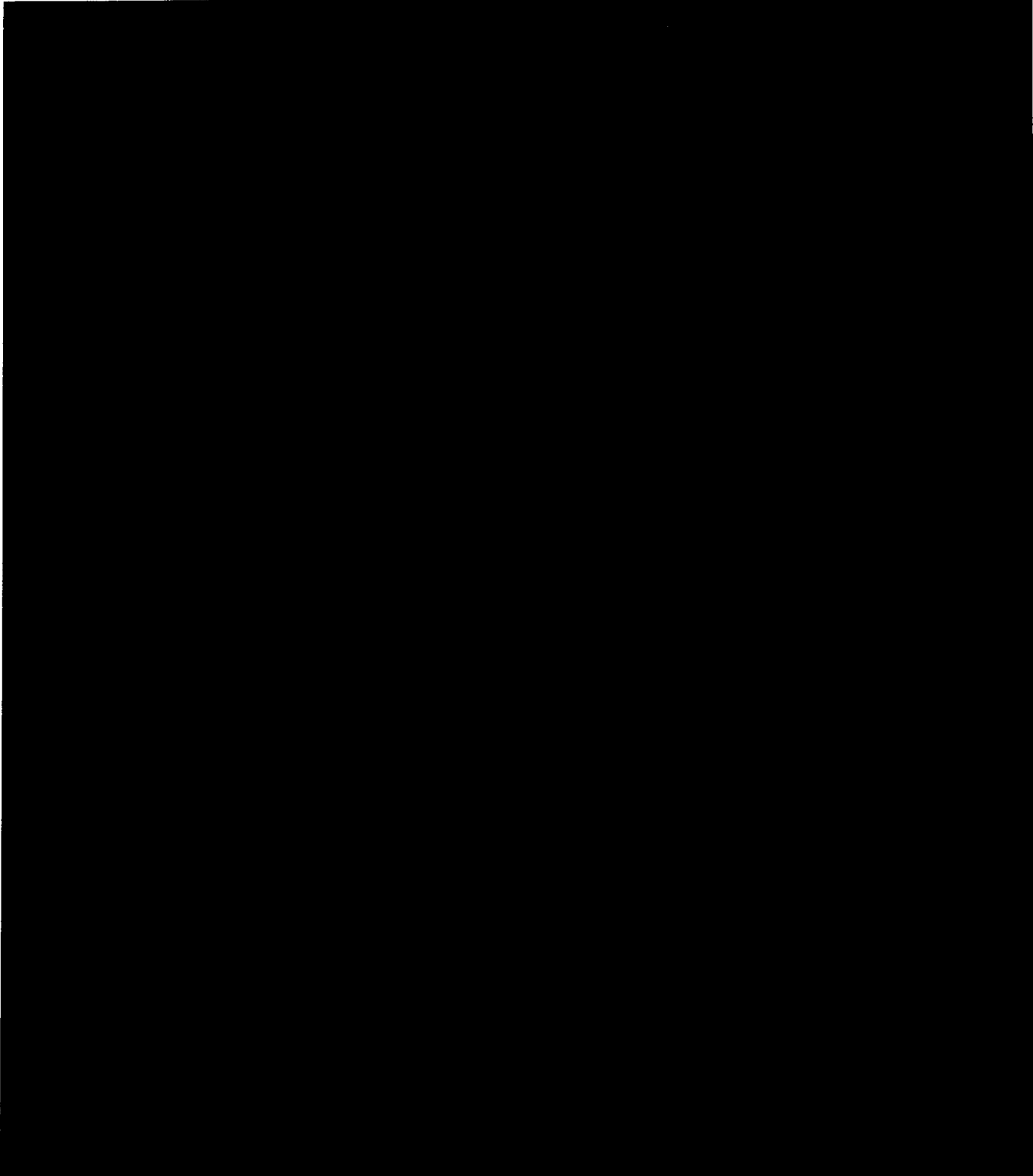
By Authority of
The State of Florida
Public Service Commission
Division of Competitive Markets and Enforcement
Bureau of Performance Analysis

DOCUMENT NUMBER-DATE

10870 DEC 12 5

FPSC-COMMISSION CLERK

Customer Data Security Issue Summary



No Issue Issue

EXHIBIT 1

Source: Company Data requests 1 and 2

1.4.4 Progress Energy Florida (PEF)

PEF appropriately places an emphasis on protecting confidential customer information. The company's procedures and employee training programs provide detailed and specific guidelines on safeguarding information. The company secures its facilities and work units to deter unauthorized access. Along with strong policies and procedures regarding confidentiality, the company's Information Management division has emphasized reducing the company's exposure to internal and external security threats.

[REDACTED]	1
[REDACTED]	2
◆ [REDACTED]	3
◆ [REDACTED]	4

1.4.5 Tampa Electric Company (TEC)

Pages 54 - 61

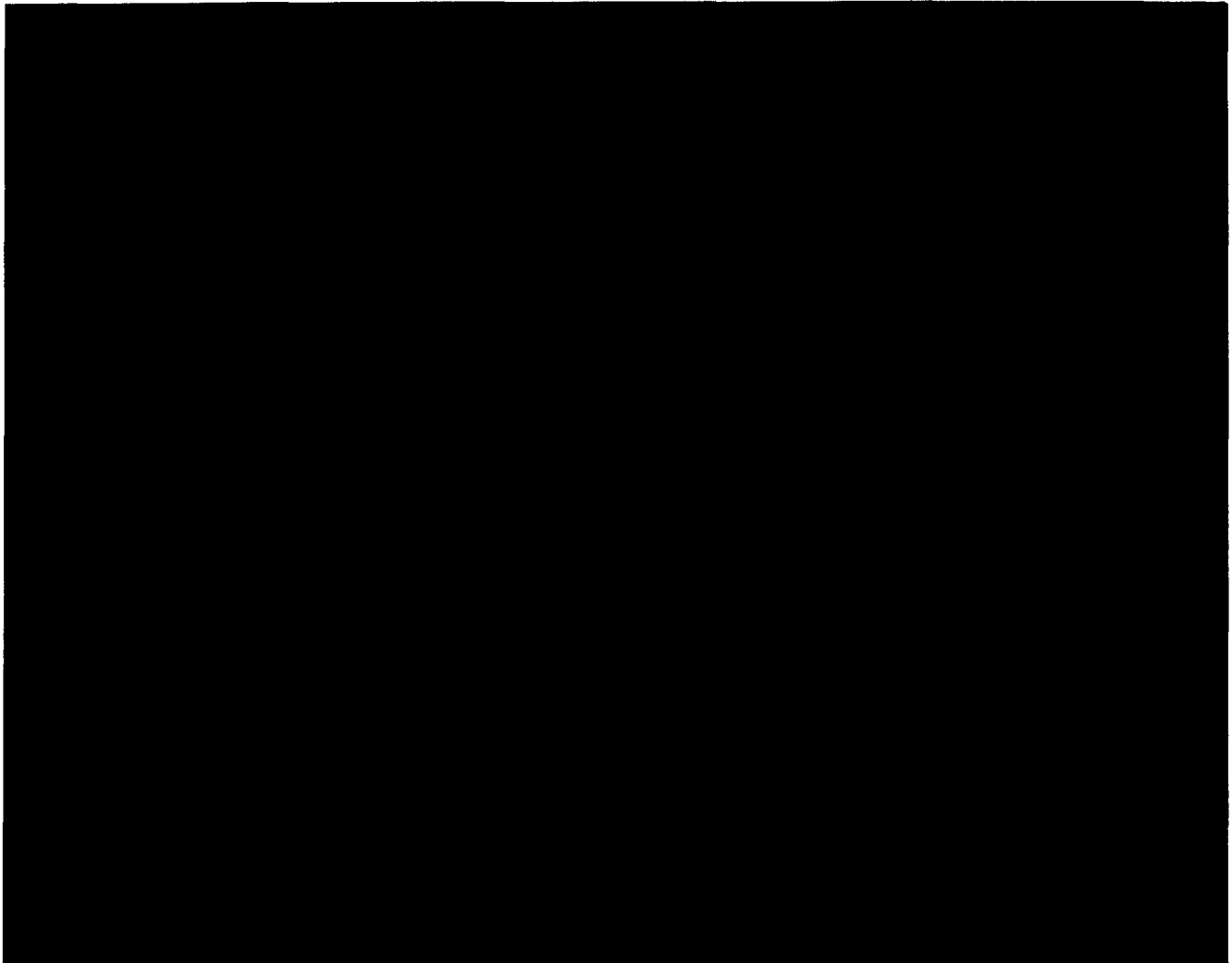
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APPENDIX B

CUSTOMER DATA SECURITY INFORMATION

Florida investor-owned utilities have programs designed to safeguard sensitive customer information. These programs are multifaceted, combining written policies, employee procedures, and management or supervisory practices. A variety of virtual and physical safeguards round out the data security system found in each company.

This chart summarizes each company's security policies, practices, and initiatives. These points are discussed in more detail in each respective company chapter.



APPENDIX C

TREATMENT OF SENSITIVE CUSTOMER DATA

Florida investor-owned utilities collect, use, and mask a variety of sensitive customer information. Collection, use, and masking of information in each company is controlled and safeguarded by a combination of written policies, employee procedures, and management supervision practices. Virtual and physical security measures in each company round out the system designed to protect the data. The following chart summarizes the information each company collects, uses, and masks.

	Collects	Uses	Masks
FP&L			
Social Security Number			
Driver's License Number			
Bank Account			
Date of Birth			
Credit Card Info			
FPU			
Social Security Number			
Driver's License Number			
Bank Account			
Date of Birth			
Credit Card Info			
GULF			
Social Security Number			
Driver's License Number			
Bank Account			
Date of Birth			
Credit Card Info			
PEF			
Social Security Number			
Driver's License Number			
Bank Account			
Date of Birth			
Credit Card Info			
TEC			
Social Security Number			
Driver's License Number			
Bank Account			
Date of Birth			
Credit Card Info			

Attachment B (DR-1)

REDACTED

(25 pages)

Attachment C (DR-1)

REDACTED

(2 pages)

Attachment D (DR-1)

REDACTED

(1 page)

Attachment F (DR-1)

REDACTED

(6 pages)

Attachment G (DR-1)

REDACTED

(3 pages)

Attachment H (DR-1)

REDACTED

(1 page)

Attachment J (DR-1)

REDACTED

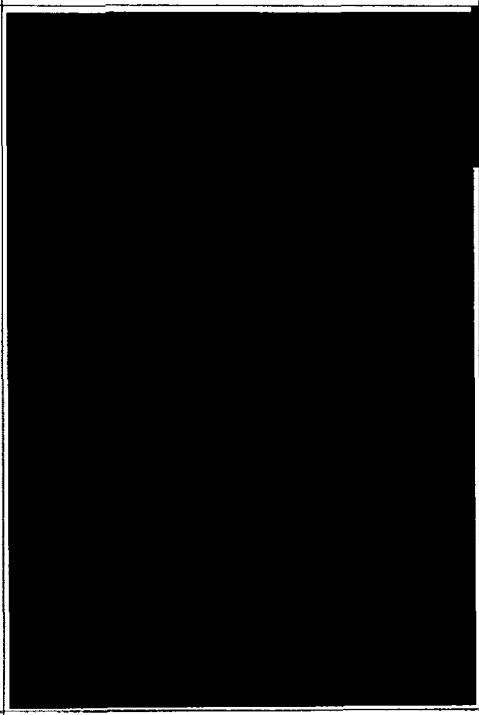
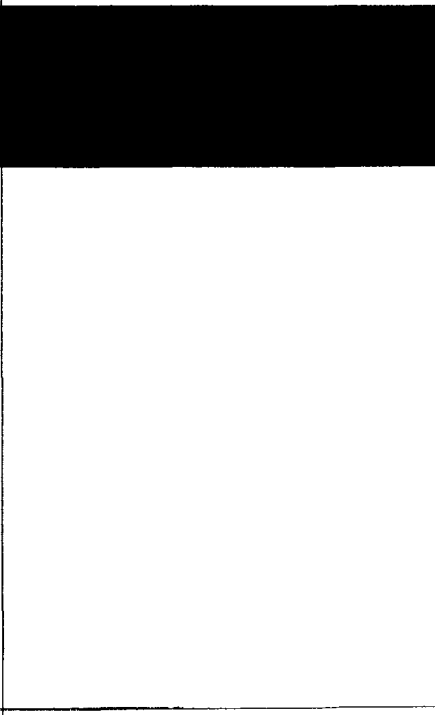
(3 pages)

Response to Data Request 2

REDACTED

(14 pages)

Bureau of Regulatory Review Workplan
Progress - IOU Data Security Review

Ref No.	Task	Audit Hours	Standard	Audit Notes	Finding
	overall system data integrity. Evaluate the company's approach to reducing these risks and the overall impact on performance		should evaluate the risks and develop a model to reduce and overcome these risks. The company should evaluate how these risks impact and inhibit overall performance.	industry to evaluate the risk to the company and customer. The company provided a copy of its risk assessment for customer data— "Privacy Audit Initiatives"	
D	Document the <u>internal controls</u> established by the company to protect its overall system integrity. Evaluate the adequacy of these controls		Management should develop internal controls based on the risks associated with its system integrity. These controls should allow the company to reduce its exposure to potential loss of information.		
E	Assess the adequacy of the <u>management control system</u> for measuring, reporting, and monitoring data		Management should continually monitor the company's compliance with its data security initiatives. The company should document	The company does have a series of controls to monitor and verify who have access to customer information. The company routinely verifies its user ID access.	

**Bureau of Performance Analysis
PEF - Document Summary and Control Log**

Company: PEF
 Area: Data Security
 Auditor(s): Coston, Rich

Workload Control #: PA-07-05-005
 File Name: Document Summary two- PEF.doc

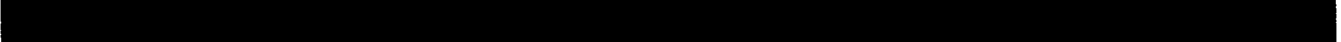
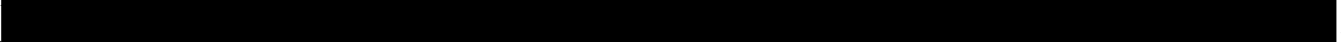
Document #: 2.1
 Date Requested:
 Date Received:
 Comments: (i.e., Confidential)

**ALL
CLAIMED
CONFIDENTIAL**

Document Title and Purpose of Review:

1. Please explain how the company complies with requirements of:
 - a. FACTA (Fair and Accurate Transactions Act)
 - b. Right to Financial Privacy Act
 - c. Drivers License Protection Act
 - d. Consumer Information and Records Disposal Act
 - e. Health Insurance Portability and Accountability Act of 1996
 - f. Florida Statute 817.5681
2. Please describe how PEF ensures compliance by its third party customer service vendors and its affiliated company with the above mentioned acts?

Summary of Contents:

A: 
 B: 
 C: 
 D: 
 F: 

Conclusions:

Data Request(s) Generated:




No. _____ Description:
 No. _____ Description:

Follow-up Required:

Document #: 2.2
 Date Requested:
 Date Received:
 Comments: (i.e., Confidential)

Document Title and Purpose of Review:

2. Please describe how PEF ensures compliance by its third party customer service vendors and its affiliated company with the above mentioned acts?

	<p>Summary of Contents: </p> <p>Conclusions:</p> <p>Data Request(s) Generated: No. _____ Description: No. _____ Description:</p> <p>Follow-up Required:</p>
<p>Document #: 2.3 Date Requested: Date Received: Comments: (i.e., Confidential)</p> <p style="text-align: center;">ALL</p> <p style="text-align: center;">CLAIMED</p> <p style="text-align: center;">CONFIDENTIAL</p>	<p>The response to DR-1, Q-13 cited no <i>customer-initiated</i> complaints or allegations regarding security of sensitive data. Please provide incident details and remedial action specifics of <u>company-discovered</u> security breaches from January 2005 through the present for:</p> <ul style="list-style-type: none"> a. Customer credit card information b. Customer bank account information c. Customer Social Security Account Number d. Customer drivers License Number e. Theft / loss of company laptop computers f. Theft / loss of company portable storage (CD, disk, hard drive, etc) <p>Summary of Contents: </p> <p>Conclusions:</p> <p>Data Request(s) Generated: No. _____ Description: No. _____ Description:</p> <p>Follow-up Required:</p>
<p>Document #: 2.4 Date Requested: Date Received: Comments: (i.e., Confidential)</p>	<p>Document Title and Purpose of Review: Is there currently a policy regarding introduction of personal electronic equipment into the workplace (e.g. cameras, voice recorders, camera-equipped cell phones or PDA devices, flash / jump drives, etc). If so, please provide a copy of the policy.</p> <p>Summary of Contents: </p>

	<div style="background-color: black; width: 100%; height: 15px; margin-bottom: 5px;"></div> Conclusions: Data Request(s) Generated: No. _____ Description: No. _____ Description: Follow-up Required:																				
<p>Document #: 2.5 Date Requested: Date Received: Comments: (i.e., Confidential)</p> <p style="text-align: center; font-size: 24px; font-weight: bold;">ALL CLAIMED CONFIDENTIAL</p>	<p>Document Title and Purpose of Review: Please complete the chart below, indicating the applicable current programs or procedures with an "X" in the appropriate box. Provide explanatory comments as needed.</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th style="width: 10%;">Collect customer SSAN</th> <th style="width: 10%;">Mask or encrypt SSAN</th> <th style="width: 10%;">Collect customer Drivers Lic #</th> <th style="width: 10%;">Mask or encrypt DL #</th> <th style="width: 10%;">Collect bank acct info</th> <th style="width: 10%;">Mask or encrypt bank info</th> <th style="width: 10%;">Collect credit card info</th> <th style="width: 10%;">Mask or encrypt credit card info</th> <th style="width: 10%;">Collect date of birth</th> <th style="width: 10%;">Mask or encrypt date of birth</th> </tr> </thead> <tbody> <tr> <td style="height: 20px;"></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p>Summary of Contents: <div style="background-color: black; width: 100%; height: 40px; margin-top: 5px;"></div> </p> <p>Conclusions: Data Request(s) Generated: No. _____ Description: No. _____ Description: Follow-up Required:</p>	Collect customer SSAN	Mask or encrypt SSAN	Collect customer Drivers Lic #	Mask or encrypt DL #	Collect bank acct info	Mask or encrypt bank info	Collect credit card info	Mask or encrypt credit card info	Collect date of birth	Mask or encrypt date of birth										
Collect customer SSAN	Mask or encrypt SSAN	Collect customer Drivers Lic #	Mask or encrypt DL #	Collect bank acct info	Mask or encrypt bank info	Collect credit card info	Mask or encrypt credit card info	Collect date of birth	Mask or encrypt date of birth												
<p>Document #: 2.6 Date Requested: Date Received: Comments: (i.e., Confidential)</p>	<p>Document Title and Purpose of Review: Please provide the number of associates in the company, holding company, and affiliated company who have access to customer:</p> <ol style="list-style-type: none"> a. full Social Security Number b. maintained Banking/credit card information c. date of birth <p>Summary of Contents: <div style="background-color: black; width: 100%; height: 20px; margin-top: 5px;"></div> </p>																				

	<p>[REDACTED]</p> <p>Conclusions:</p> <p>Data Request(s) Generated: No. _____ Description: No. _____ Description:</p> <p>Follow-up Required:</p>
<p>Document #: 2.7 Date Requested: Date Received: Comments: (i.e., Confidential)</p> <p style="text-align: center;">ALL</p> <p style="text-align: center;">CLAIMED</p> <p style="text-align: center;">CONFIDENTIAL</p>	<p>Document Title and Purpose of Review: Please provide the number of contracted third-party associates who have access to customer:</p> <ul style="list-style-type: none"> a. full Social Security Number b. maintained Banking/credit card information c. date of birth <p>Summary of Contents: [REDACTED]</p> <p>Conclusions:</p> <p>Data Request(s) Generated: No. _____ Description: No. _____ Description:</p> <p>Follow-up Required:</p>
<p>Document #: 2.8 Date Requested: Date Received: Comments: (i.e., Confidential)</p>	<p>Document Title and Purpose of Review: Please describe how the company monitors the deposal of customer information for affiliated associates who assist with PEF customer inquires</p> <p>Summary of Contents: [REDACTED]</p> <p>Conclusions:</p> <p>Data Request(s) Generated: No. _____ Description: No. _____ Description:</p> <p>Follow-up Required:</p>
<p>Document #: 2.9 Date Requested: Date Received:</p>	<p>Document Title and Purpose of Review: In DR 1 response attachment J, please describe the chart and explain the reasoning and impacts of the "Business Continuity" percentage reporting as off-target.</p>

<p>Comments: (i.e., Confidential)</p> <p style="text-align: center;">ALL</p> <p style="text-align: center;">CLAIMED</p> <p style="text-align: center;">CONFIDENTIAL</p>	<p>Summary of Contents:</p> <div style="background-color: black; height: 40px; width: 100%;"></div> <p>Conclusions:</p> <p>Data Request(s) Generated:</p> <p>No. _____ Description:</p> <p>No. _____ Description:</p> <p>Follow-up Required:</p>
<p>Document #: 2.10</p> <p>Date Requested:</p> <p>Date Received:</p> <p>Comments: (i.e., Confidential)</p>	<p>Document Title and Purpose of Review:</p> <p>Has all of the action plans for the December 2006 audit been completed? If not, please provide a status and new target completion date.</p> <p>Summary of Contents:</p> <div style="background-color: black; height: 40px; width: 100%;"></div> <p>Conclusions:</p> <p>Data Request(s) Generated:</p> <p>No. _____ Description:</p> <p>No. _____ Description:</p> <p>Follow-up Required:</p>

Bureau of Performance Analysis

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**Bureau of Performance Analysis
Interview Summary**

Company: Progress Energy-Florida

Interview Number:

File Name:

Date of Interview: August 8, 2007

PEF Clearwater-Bayview offices

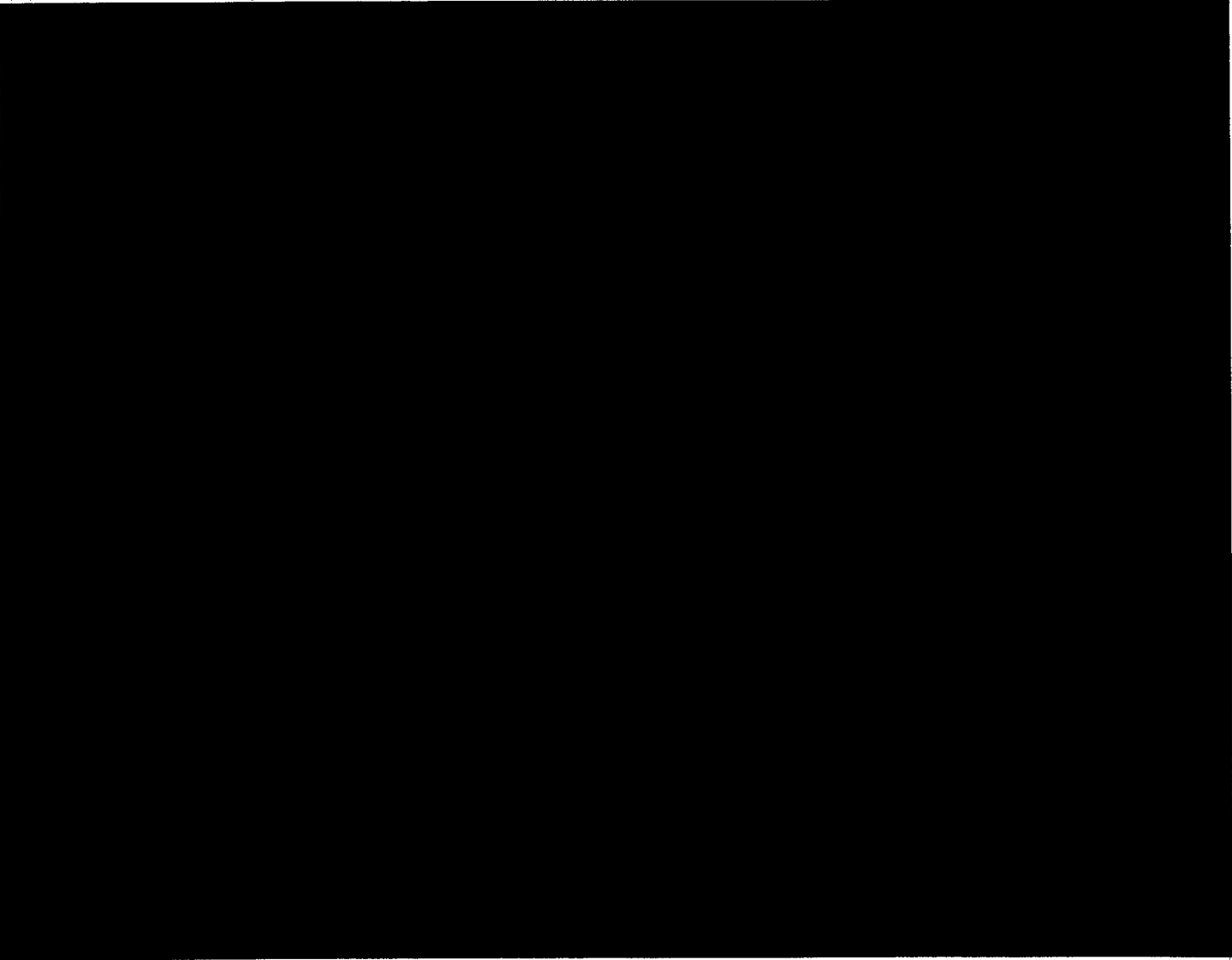
Clearwater, FL

Name:

Elaine McCallister, sr. Financial Analyst, Customer Services Operations

(1) Purpose of Interview: Gain an understanding of PEF's initiatives and policies concerning Data Security.

(2) Interview Summary:



Pages 2 - 7

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