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In response to the December 4, 2012, invitation for industry comment, Xcel Energy respectfully submits the following suggestions for enhancing NAESB's proposed *Retail Customer Authorization For Release Of Retail Customer-Specific Data* form:

- It may be beneficial to indicate on the form whether the release authorization is for a *one-time* information release versus an *ongoing* information release (for the term of the release authorization).
- It may be useful to give the customer the option (or notice) of the *form of communication* to be used by the Distribution Company when it releases information to the Third-Party – i.e., electronic transmission versus hard copy (mail).
- To add clarity to the wording and process for a Customer to appoint and use an agent for their account (page two of the proposed form), we suggest a statement similar to the following: “I \_\_\_\_\_ (*Customer*) do hereby appoint \_\_\_\_\_ (*Representative's name and address*) to act as my agent for the *account(s) listed on page 1.*” This statement should be followed closely by the signature of the Customer. The information release authorization order should then have a separate signature line, which either the Customer or the duly authorized agent would sign.
- The word “should” is used multiple times in the concluding paragraph of the proposed form. It may be preferable to use the word “must” or “shall,” to make clear that the authorization request will only be honored if all of the required steps are properly completed.
- We suggest adding a ‘limitation of liability’ statement to the form, perhaps something like, “*The Customer hereby releases the Distribution Company, its employees, officers, and agents from any and all liability associated with the Third-Party's use and/or dissemination of account information that the Distribution Company provides in accordance with this release authorization.*”

Sincerely,

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