

### **Voluntary Code of Conduct Adoption Blueprint**

Service Providers choosing to adopt the DOE Voluntary Code of Conduct (VCC) are expected to publicly commit to conformance with and observance of the VCC. After the VCC concepts and principles are finalized, DOE will make the finalized VCC available on the [www.smartgrid.gov/privacy](http://www.smartgrid.gov/privacy) website or a comparable website. Once available, Service Providers will be able to download the VCC, review it, share it internally, and begin the conversations necessary to begin considering and ultimately determining whether to adopt.

Once a Service Provider has determined that it is in conformance with and ready to adopt the VCC, it will sign the Adoption Statement (Appendix A) and submit it to DOE. (Signatures should come from an individual within the Service Provider's organization with sufficient authority to commit the organization to the VCC.) By signing and submitting the Adoption Statement, the company signifies that it is in conformance with the VCC as of the effective date listed on the Adoption Statement.

After DOE receives a Service Provider's Adoption Statement, that Service Provider may utilize the VCC materials (logo, talking points, template press release, etc...) to shape its own announcements and communications about its adoption of the VCC. DOE will publish and maintain a list of those organizations publicly committing to conformance with the VCC on [www.smartgrid.gov/privacy](http://www.smartgrid.gov/privacy) or on a comparable website.

**Appendix A – VCC Adoption Statement**

By executing this adoption statement, I hereby certify that \_\_\_\_\_ voluntarily commits to conform its policies, practices, and procedures to the principles contained in the DOE Voluntary Code of Conduct. I understand that \_\_\_\_\_ has the right to voluntarily opt out of this commitment at any time and for any reason by notifying the Department of Energy in writing of its decision to opt out and the effective date for which the opt out shall take place.

I further represent and warrant that I have been duly authorized to commit \_\_\_\_\_ to the Voluntary Code of Conduct.

Executed by:

Name: \_\_\_\_\_  
Title: \_\_\_\_\_  
Company: \_\_\_\_\_  
Date: \_\_\_\_\_

VCC Single Point of Contact:

Name: \_\_\_\_\_  
Title: \_\_\_\_\_  
Company: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_  
Email: \_\_\_\_\_

Effective Date of  
Conformance with  
VCC: \_\_\_\_\_

**DOE Voluntary Code of Conduct Revision Blueprint**

1. DOE will coordinate a VCC Revisions Working Team (RWT) to review the VCC for updates and revisions every 2 years. The team will review any suggested revisions received over the past years as well as conduct an independent review of the VCC to determine if any revisions may be warranted. The RWT will be made up of volunteers, and best efforts should be made to ensure that the RWT is populated by a diverse set of stakeholders, such as utilities of various sizes, municipalities, cooperatives, consumer advocates, privacy advocates, regulators and/or third parties. The volunteers will serve for finite terms, although they could be subject to some degree of voluntary renewal upon approval of the entire RWT. The initial RWT, once formed, will discuss and decide issues regarding governance, bylaws, finite terms, etc.
2. In determining whether revisions to the VCC should be made, the following common criteria should be given special consideration:
  - a. Changes in technology and innovation that might render portions of the VCC obsolete or outdated, or that present risks that the current version does not, but should address.
  - b. Widespread changes in regulations or other requirements that may conflict with current VCC.
  - c. Previously unknown data vulnerability not addressed elsewhere in the VCC.
3. In addition, the RWT may assess suggested revisions of an urgent nature that are clearly identified as needing a determination prior to the next two year deadline. The RWT has discretion to determine for itself by a majority vote on a case-by-case basis, whether urgent action is necessary or whether the petition may be addressed consistent with the two-year schedule.
  - a. For example, a legal or regulatory change of national scope that goes into effect prior to the two year deadline or the implementation grace period could, at the discretion of the RWT, warrant urgent review.
  - b. However, legal, regulatory or technical changes that may impact the way a single Service Provider or small set of Service Providers implement the VCC, although not necessarily conflicting with the language of the VCC principles themselves, may not require an urgent determination.
  - c. In general, local or individual impacts could necessitate a conversion to partial adoption, but not necessarily warrant a wholesale revision to the VCC principles outside of the two-year schedule.
4. If the RWT determines that an update is needed, then a consensus-based update process will be initiated similar to the process used in the initial development of the VCC. A smaller task force can work on drafting the language or revisions necessitated by the update and present to the larger volunteer group to ratify. The revisions process, like the initial development process, should include broad stakeholder input. After the working group has finalized the proposed revision(s), a stakeholder meeting can take place to ratify them.
5. After consensus is reached and the VCC has been updated, current adopters of the initial VCC will have one year from ratification to determine the impacts of the revised VCC.

- a. An adopting Service Provider may opt out of the revised VCC by communicating such intent and the effective date of its opt out to the DOE. If opting out, the Service Provider must remove all VCC logos from communication by the opt-out effective date included in its notification to DOE.