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Date: October 14, 2014

VIA ELECTRONIC MAIL

Attn: Mr. Eric Lightner, Director
Federal Smart Grid Task Force
Office of Electricity Delivery and Energy Reliability
U.S. Department of Energy
1000 Independence Avenue SW
Washington, DC 20585
VCC-Privacy@hq.doe.gov

Re: Department of Energy Request for Public Comment on Draft Voluntary Code of Conduct

Southern Company Services, Inc., as agent for and on behalf of operating affiliates Alabama Power Company, Georgia Power Company, Gulf Power Company, and Mississippi Power Company (collectively "Southern Company" or "Southern"), is pleased to have this opportunity to provide input in response to the Department of Energy's ("DOE") Request for Public Comment referenced above regarding the draft Voluntary Code of Conduct ("VCC").

As one of the premier energy companies serving the southeastern United States, Southern Company is a leading U.S. producer of nearly 46,000 MW of safe, reliable and affordable electricity to approximately 4.4 million customers across a 120,000 square mile territory in Alabama, Florida, Georgia, and Mississippi. Southern Company has invested billions of dollars over several years to build and maintain a smarter, more robust transmission and distribution system, including the application of intelligent electronic devices such as smart grid technologies. In 2010, Southern Company signed a Smart Grid Investment Grant agreement with DOE, formally accepting \$165 million in matching funds to be dispensed throughout the company's four-

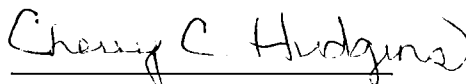
state service territory over a three-year period, thus enabling Southern Company to accelerate its deployment of these technologies.

Southern recognizes the importance of protecting customer privacy and encouraging innovation while maintaining reliable, affordable electric service. Southern Company brands are known for energy innovation, excellent customer service, high reliability and retail electric prices that are below the national average. Southern provided input in 2010 to DOE's Requests for Information regarding smart grid privacy and other emerging smart grid issues, and continues to participate and provide industry perspective to multiple privacy-related initiatives through DOE, EEI, NIST, NAESB, SGIP, and various other organizations.

Southern supports the continued development of the VCC, and has been heavily involved in this multistakeholder collaborative effort to support the VCC's development efforts and to provide input reflecting the perspective of investor-owned utilities and the electric utility industry in general. Southern observes that the draft VCC intentionally provides high level, flexible principles which can be voluntarily adopted in a variety of contexts by various utilities and third parties while still providing certainty and confidence to utilities, third party service providers, customers, regulators, and the public as to certain basic standards of customer data privacy and security. Southern looks forward to the continued evolution of the draft VCC as it responds to feedback obtained through its continuing development and implementation activities and through the public comments received in this proceeding.

Southern Company appreciates the opportunity to respond to DOE's request for public comment and commends the hard work and collaborative spirit of the many volunteers that have worked on the draft VCC up until this point. Southern looks forward to participating further in the ongoing discussion of VCC and other customer data issues.

Respectfully submitted,



Cherry C. Hudgins
Customer Policy and Product Support Manager
Southern Company Services, Inc.

CC: Charles W. Darville