

**ANNUAL § 64.2009(e) CPNI CERTIFICATION FOR 2019**

1. Date filed: February 1, 2019
2. Name of company(s): Columbia Energy, LLC
3. Form 499 Filer ID: 831239
4. Name of signatory: Robert Greene
5. Title of signatory: Manager of Communications and IT
6. Certification:

I, Robert Greene, certify that I am an officer of Columbia Energy, LLC ("Columbia Energy"), and acting as an agent of Columbia Energy, that I have personal knowledge that Columbia Energy has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

Attached to this certification is a statement explaining how Columbia Energy's procedures ensure that Columbia Energy is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping and supervisory review) set forth in Section 64.2001 *et seq.* of the Commission's rules.

Columbia Energy has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

Columbia Energy has not received customer complaints in the past year concerning the unauthorized release of CPNI.

Columbia Energy represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. Columbia Energy also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Name



Title: Manager of Communications

Date: 2-19-2019

## STATEMENT OF CPNI COMPLIANCE PROCEDURES

Columbia Energy, LLC ("Columbia Energy") has established and implemented the following internal policies and procedures to ensure compliance with the requirements of Section 222 of the Communications Act of 1934, as amended, and with Federal Communications Commission rules governing Customer Proprietary Network Information ("CPNI"), codified at 47 C.F.R. § 64.2001 *et seq.*

The following operating procedures are intended to ensure that Columbia Energy complies with the CPNI Rules:

1. Columbia Energy does not make available to any affiliated or unaffiliated entity information which meets the definition of CPNI set forth at 47 U.S.C. § 222(h)(1), except when required to do so by the law.
2. Columbia Energy only uses CPNI to render, and bill for, the telecommunications services it provides to its customers. Columbia Energy does not use its customers' CPNI for any marketing purpose, either internal or external, or any other purpose set forth in the CPNI Rules.
3. Columbia Energy has established the following practices and procedures governing the disclosure of CPNI:
  - (a) Columbia Energy does not disclose or release CPNI upon a customer's telephone request except under the following circumstances: (i) Columbia Energy verifies the identity of the caller by return call to the telephone number of record in the customer's file; and (ii) Columbia Energy sends the CPNI to the customer's address of record in the customer's file.
  - (b) Columbia Energy automatically notifies customers (at the customer's original telephone number or address on file) in case any changes are made to the customer's primary account information.
  - (c) Columbia Energy has implemented procedures to notify the required U.S. government agencies in the event of a breach of the CPNI rules and to provide the required notice to affected customers of any such breach.
4. Columbia Energy provides comprehensive training on these practices and procedures to all relevant employees. Columbia Energy has established a supervisory review process regarding compliance with the CPNI rules for outbound marketing situations. Columbia Energy maintains records of carrier compliance for a minimum of one year.

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5. Because Columbia Energy does not use CPNI for any purpose and does not provide CPNI to other entities (except when compelled under the law to do so, or as requested to so by customers), it has not implemented either “opt-in” or “opt-out” CPNI approval procedures, *see* 47 C.F.R. § 64.2007, and it has not implemented the CPNI notification procedures, *see* C.F.R. § 64.2008.
  6. In the event that Columbia Energy in the future plans to utilize CPNI to provide CPNI to other entities other than as described above, it will first provide customers notification of their CPNI rights as required by 47 C.F.R. § 64.2008.
  7. It is a violation of Columbia Energy policies to disclose CPNI outside of Columbia Energy. Any employee found to have violated this policy will be subject to disciplinary action up to and including termination.
  8. Access to CPNI at Columbia Energy is restricted to a limited number of employees and controlled through the use of active security and other measures, including the use of special passwords that are assigned on a limited basis and technological measures which prohibit the electronic reproduction or distribution of CPNI. Encryption and other security practices are utilized when CPNI is transmitted electronically.
  9. Controls are in place involving responses to law enforcement agencies that serve Columbia Energy with valid legal demands, such as a court ordered subpoena, for CPNI. Columbia Energy will not supply CPNI to any law enforcement agency that does not produce a valid legal demand.