



Norton Rose Fulbright US LLP  
799 9th Street NW  
Suite 1000  
Washington, DC 20001-4501  
United States

**Chris Cwalina**  
**Partner**  
Direct line 202 662 4691  
chris.cwalina@nortonrosefulbright.com

August 3, 2018

**VIA EMAIL (attorneygeneral@doj.nh.gov)**

Tel +1 202 662 0200  
Fax +1 202 662 4643  
nortonrosefulbright.com

Office of the Attorney General  
33 Capitol Street  
Concord, NH 03301

Re: Legal Notice of Information Security Incident

Dear Sirs or Madams:

Pursuant to N.H Rev. Stat. §359-C:20, I write on behalf of my client, North American Power & Gas, LLC (“NAP”), to inform you of a potential security incident that may have affected the personal information of approximately 20 New Hampshire residents. At this time, NAP has no evidence that any of the potentially affected New Hampshire residents’ information has been misused.

NAP had placed certain information in storage containers hosted by Amazon Web Services (“AWS”), and on or around May 10, 2018, discovered that the storage containers were improperly configured such that the files were accessible publicly on the internet if the paths to the files were discovered, potentially allowing unauthorized access to that information. Upon discovery, NAP remediated the AWS storage container vulnerability, as well as engaged the assistance of two cybersecurity and forensic firms to investigate and determine what information was potentially exposed, and to determine whether there was any evidence of compromise, including by conducting a Dark Web search for evidence of stolen information. Based on the thorough investigation to date, at this time, NAP has no evidence that any New Hampshire residents’ information has been misused as a result of how the information was stored.

In July 2018, NAP’s forensic investigation confirmed that personal information, as defined under §359-C:19, of certain New Hampshire residents was potentially at issue. NAP determined that certain information, including names, SSNs, addresses, email addresses, phone numbers, state or national identification numbers, passports, dates of birth, tax payer identification numbers, and trade line information, was present in files that were not properly secured. Because NAP takes the privacy of personal information very seriously, and regrets that this this type of information was vulnerable, NAP is notifying New Hampshire affected residents and has engaged Kroll to provide identity monitoring, consultation and restoration services at no cost for two years to all potentially affected individuals. Kroll’s services include, but are not limited to, single bureau credit report, triple bureau credit monitoring, fraud consultation, identity theft restoration services, and a \$1M identity fraud loss reimbursement insurance policy.

Norton Rose Fulbright US LLP is a limited liability partnership registered under the laws of Texas.

73074591.2

Norton Rose Fulbright US LLP, Norton Rose Fulbright LLP, Norton Rose Fulbright Australia, Norton Rose Fulbright Canada LLP and Norton Rose Fulbright South Africa Inc are separate legal entities and all of them are members of Norton Rose Fulbright Verein, a Swiss verein. Norton Rose Fulbright Verein helps coordinate the activities of the members but does not itself provide legal services to clients. Details of each entity, with certain regulatory information, are available at [nortonrosefulbright.com](http://nortonrosefulbright.com).

In addition to providing identity protection services, NAP is also conducting a thorough review of its security measures, internal controls, and safeguards and is making changes to help prevent a similar incident in the future. NAP also contacted law enforcement and will continue to cooperate in their investigation of this incident.

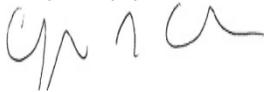
Affected individuals are being notified via mailed letter on August 6, 2018. A form copy of the letter provided to affected New Hampshire residents is included for your reference.

Below is the contact information for Seth Hopson, Senior Counsel, at North American Power & Gas:

Seth Hopson  
Senior Counsel  
North American Power & Gas  
20 Glover Ave.  
Norwalk, CT 06850  
(203) 663-9761  
shopson@napower.com

If you have any questions or need further information regarding this incident, please contact me at (202) 662 4691 or [chris.cwalina@nortonrosefulbright.com](mailto:chris.cwalina@nortonrosefulbright.com).

Very truly yours,



Chris Cwalina

CGC/

Enclosure



<<Date>> (Format: Month Day, Year)

<<MemberFirstName>> <<MemberMiddleName>> <<MemberLastName>> <<Suffix>>  
<<Address1>>  
<<Address2>>  
<<City>>, <<State>> <<ZipCode>>

*RE: Notice of Data Security Incident*

Dear <<MemberFirstName>> <<MemberLastName>>>,

We are writing to let you know about a potential data security incident. We take the protection and proper use of information very seriously. For this reason, we are contacting you directly to explain the circumstances of the incident and to provide you with steps you can take to protect yourself.

### **What Happened**

We learned that certain information was electronically stored in a way that allowed unauthorized access to that information. Upon learning of this issue, we immediately launched an investigation and confirmed in July 2018 that your information was potentially at issue. We also contacted law enforcement and are assisting them in their investigation.

At this time, we have no evidence that your information has been misused, but we wanted to alert you of the possibility, and provide you with information and protective measures you can take. We encourage you to take the preventative measures outlined in this letter to help protect your information.

### **What Information Was Involved**

The information contained in the files at issue may include your name, address, email address, phone number, Social Security number, trade line information, Driver's License number, State ID number, Passport number, taxpayer information, and date of birth.

### **What We Are Doing**

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for two years. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, a Current Credit Report, Web Watcher, Public Persona, Quick Cash Scan, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

Visit [my.idmonitoringservice.com](http://my.idmonitoringservice.com) to activate and take advantage of your identity monitoring services.

You have until **November 1, 2018** to activate your identity monitoring services.

Membership Number: <<Member ID>>

To receive credit services by mail instead of online, please call 1-833-221-9233. Additional information describing your services is included with this letter.

### **What you can do.**

Please review the enclosed "Additional Resources" section included with this letter. This section describes additional steps you can take to help protect yourself, including recommendations by the Federal Trade Commission regarding identity theft protection and details on how to place a fraud alert or a security freeze on your credit file.

**For more information.**

If you have questions, please call 1-833-221-9233, Monday through Friday from 8:00 a.m. to 5:00 p.m. Central Time. Please have your membership number ready.

Protecting your information is important to us. We trust that the services we are offering to you demonstrate our continued commitment to your security and satisfaction.

Sincerely,

A handwritten signature in black ink that reads "Michael S. Sullivan". The signature is written in a cursive style with a large, stylized initial "M".

Michael S. Sullivan

President

North American Power & Gas, LLC

## ADDITIONAL RESOURCES

### Contact information for the three nationwide credit reporting agencies is:

**Equifax**, PO Box 740241, Atlanta, GA 30374, [www.equifax.com](http://www.equifax.com), 1-800-685-1111

**Experian**, PO Box 2104, Allen, TX 75013, [www.experian.com](http://www.experian.com), 1-888-397-3742

**TransUnion**, PO Box 2000, Chester, PA 19022, [www.transunion.com](http://www.transunion.com), 1-800-888-4213

**Free Credit Report.** It is recommended that you remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring your credit report for unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting agencies.

To order your annual free credit report please visit **[www.annualcreditreport.com](http://www.annualcreditreport.com)** or call toll free at **1-877-322-8228**.

You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available from the U.S. Federal Trade Commission's ("FTC") website at [www.consumer.ftc.gov](http://www.consumer.ftc.gov)) to:  
Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

### **For Colorado, Georgia, Maine, Maryland, Massachusetts, New Jersey, Puerto Rico, and Vermont residents:**

You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain such additional report(s).

**Fraud Alert.** You may place a fraud alert in your file by calling one of the three nationwide credit reporting agencies above. A fraud alert tells creditors to follow certain procedures, including contacting you before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit.

**Security Freeze.** You have the ability to place a security freeze on your credit report.

A security freeze is intended to prevent credit, loans and services from being approved in your name without your consent. To place a security freeze on your credit report, you may be able to use an online process, an automated telephone line, or a written request to any of the three credit reporting agencies listed above. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. The credit reporting agencies may charge a fee to place a freeze, temporarily lift it or permanently remove it. The fee is waived if you are a victim of identity theft and have submitted a valid investigative or law enforcement report or complaint relating to the identity theft incident to the credit reporting agencies. (You must review your state's requirement(s) and/or credit bureau requirement(s) for the specific document(s) to be submitted.)

**For Massachusetts residents:** The fee for each placement of a freeze, temporary lift of a freeze, or removal of a freeze is \$5.

**Federal Trade Commission and State Attorneys General Offices.** If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your home state. You may also contact these agencies for information on how to prevent or avoid identity theft.

You may contact the **Federal Trade Commission**, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580, [www.ftc.gov/bcp/edu/microsites/idtheft/](http://www.ftc.gov/bcp/edu/microsites/idtheft/), 1-877-IDTHEFT (438-4338).

**For Maryland residents:** You may contact the Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, [www.oag.state.md.us](http://www.oag.state.md.us), 1-888-743-0023.

**For North Carolina residents:** You may contact the North Carolina Office of the Attorney General, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, [www.ncdoj.gov](http://www.ncdoj.gov), 1-877-566-7226.

### **Reporting of identity theft and obtaining a police report.**

**For Iowa residents:** You are advised to report any suspected identity theft to law enforcement or to the Iowa Attorney General.

**For Massachusetts residents:** You have the right to obtain a police report if you are a victim of identity theft.

**For Oregon residents:** You are advised to report any suspected identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General.



## TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You've been provided with access to the following services<sup>1</sup> from Kroll:

### **Triple Bureau Credit Monitoring and Single Bureau Credit Report**

Your current credit report is available for you to review. You will also receive alerts when there are changes to your credit data at any of the three national credit bureaus—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who can help you determine if it's an indicator of identity theft.

### **Web Watcher**

Web Watcher monitors internet sites where criminals may buy, sell, and trade personal identity information. An alert will be generated if evidence of your personal identity information is found.

### **Public Persona**

Public Persona monitors and notifies when names, aliases, and addresses become associated with your Social Security number. If information is found, you'll receive an alert.

### **Quick Cash Scan**

Quick Cash Scan monitors short-term and cash-advance loan sources. You'll receive an alert when a loan is reported, and you can call a Kroll fraud specialist for more information.

### **\$1 Million Identity Fraud Loss Reimbursement**

Reimburses you for out-of-pocket expenses totaling up to \$1 million in covered legal costs and expenses for any one stolen identity event. All coverage is subject to the conditions and exclusions in the policy.

### **Fraud Consultation**

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

### **Identity Theft Restoration**

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator can dig deep to uncover the scope of the identity theft, and then work to resolve it.

<sup>1</sup> Kroll's activation website is only compatible with the current version or one version earlier of Internet Explorer, Chrome, Firefox, and Safari. To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.