

STATE OF NEW JERSEY
OFFICE OF ADMINISTRATIVE LAW
BEFORE THE HONORABLE IRENE JONES

IN THE MATTER OF THE VERIFIED)
PETITION OF ROCKLAND ELECTRIC)
COMPANY FOR APPROVAL OF)
CHANGES IN ELECTRIC RATES, ITS)
TARIFF FOR ELECTRIC SERVICE,)
AND ITS DEPRECIATION RATES, AND)
FOR OTHER RELIEF)

BPU DOCKET NO. ER19050552
OAL DOCKET NO. PUC07548-2019

DIRECT TESTIMONY OF
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ON BEHALF OF THE
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1 **I. INTRODUCTION**

2 ***Qualifications***

3 **Q: Please state your name, position, and business address.**

4 A: My name is Susan M. Baldwin. My business address is 13 Church Hill Street,
5 Watertown, Massachusetts, 02472. Since 1984, I have been specializing in the
6 economics, regulation, and public policy of utilities, with a long-standing focus on
7 telecommunications and with a more recent focus on consumer issues in electric and gas
8 markets. Since 2001, I have been consulting to public sector agencies and consumer
9 advocates as an independent consultant.

10 **Q: Please summarize your educational background and professional experience.**

11 A: I have prepared a Statement of Qualifications, which is included as Attachment A.

12 **Q: Have you testified previously before the New Jersey Board of Public Utilities**
13 **(“Board”)?**

14 A: Yes, as Attachment A shows, I have testified many times before the Board, primarily on
15 behalf of the New Jersey Division of Rate Counsel (“Rate Counsel”).

16 **Q: Have you analyzed customer issues in electric and gas markets previously?**

17 A: Yes. I have analyzed the customer service of the following electric utilities: Atlantic City
18 Electric Company (“ACE”) (Docket No. ER16030252, Docket No. ER17030308, and
19 Docket No. ER18080925); Jersey Central Power & Light Company (“Jersey Central
20 Power”) (Docket No. ER16040383); and Public Service Electric and Gas Company
21 (“PSE&G”) (BPU Docket Nos. ER18010029 & GR18010030).

22
23 In addition to analyzing PSE&G’s gas customer service, I also analyzed the customer
24 service of the following New Jersey gas utilities: New Jersey Natural Gas (Docket No.

1 GR15111304, and Docket No. GR19030420), Pivotal Utility Holdings, Inc. d/b/a
2 Elizabethtown Gas (Docket No. GR16090826I and Docket No. GR19040486), and South
3 Jersey Gas Company (Docket No. GR17010071).

4
5 Also, in March 2018, I completed an in-depth analysis of the residential electric supply
6 market on behalf of the Massachusetts Office of the Attorney General, which I
7 subsequently updated in July 2019. In 2014 and in 2019, I submitted testimony on behalf
8 of the Connecticut Office of Consumer Counsel regarding suppliers' rates, customer
9 complaints and the participation of hardship customers in the electric retail supplier
10 market. In 2015, I provided technical assistance to the Massachusetts Office of the
11 Attorney General regarding the development of consumer protection measures in the
12 retail electric supplier market. As Attachment A shows, between 1978 and 1983, I
13 analyzed energy policy for, among others, several government agencies in New England.
14

15 ***Assignment***

16 **Q: On whose behalf is this testimony being submitted?**

17 A: This testimony, which concerns customer service matters relating to Rockland Electric
18 Company ("Rockland" or "Company"), is being submitted on behalf of Rate Counsel.

1 **Summary of Testimony**
2

3 **Q: Please summarize your testimony.**

4 A: Based on my review and analysis of the Company’s Petition and its responses to Rate
5 Counsel discovery questions, I conclude that 1) the Company’s customer service relative
6 to its responsiveness to customers’ calls to the Company has been inadequate, compared
7 with its own previous performance and with two other New Jersey utilities; and 2)
8 because Rockland does not now report to the Board its performance relative to generally
9 accepted customer service metrics, there is insufficient accountability to and oversight by
10 the Board and its Staff of the Company’s customer service. That places customers at risk
11 of customer service deterioration, and prevents the Board from being able to readily
12 compare Rockland’s customer service quality with that provided by other utilities, and
13 ensure that customers are receiving safe, proper and adequate service.

14
15 To remedy these issues, I recommend that the Board establish measures for
16 accountability by the Company to the Board and reporting to Board Staff and Rate
17 Counsel to improve Rockland’s call answer quality, to enable the Board to monitor
18 Rockland’s customer service, and to ensure that Rockland sustains adequate customer
19 service based on the criteria discussed below.

20 **Q: Have you formed an opinion as to customer service metrics that Rockland should**
21 **report to the Board?**

22 A: Yes. Based on my review of the information provided by the Company in response to
23 Rate Counsel’s discovery, and in comparison to Board approved service metrics reported
24 by other New Jersey utilities, I determined that the Company needs to report on a

1 minimum of ten customer service metrics to Board Staff and Rate Counsel to ensure that
2 customers are receiving safe, proper and adequate service.

3
4 These proposed service metrics include:

- 5 - three metrics relating to the quality of call answering (average speed of answer,
6 abandonment rate, and percent of calls answered within 30 seconds);
- 7 - two metrics relating to meter reading and billing accuracy (percent of meters read on
8 time and number of re-bills per thousand customers);
- 9 - one metric relating to service appointments (percent of appointments met);
- 10 - one metric relating to customer satisfaction (number of complaints per thousand
11 customers); and
- 12 - three metrics relating to the goal of minimizing residential disconnections for non-
13 payment (participation in financial assistance programs, information about deferred
14 payment arrangements, and numbers of residential disconnections for non-payment).

15 Rockland’s reporting to both Board Staff and Rate Counsel on service metrics and
16 standards will assist the Board in ensuring that Rockland’s customer service is safe,
17 proper and adequate.¹

¹ See N.J.S.A. 48:3-3(a).

1 **II. CUSTOMER SERVICE REPORTING TO THE BOARD**

2 **Q: Please describe Rockland’s New Jersey operations.**

3 A: Rockland is a subsidiary of Orange and Rockland Utilities, Inc. (“O&R”), which is
4 wholly owned by Consolidated Edison Company of New York, Inc. (“Con Edison”).
5 Rockland provides electric service to approximately 73,000 customers in parts of Sussex,
6 Bergen and Passaic Counties of New Jersey.² Unlike ACE and PSE&G, the Board has
7 not defined or mandated any specific metrics that the Company must follow.³ The
8 Company’s parent, O&R, provides customer service reports to the New York Public
9 Service Commission (“NYPSC”) that combines data from the service areas of both O&R
10 and Rockland.⁴

11 **Q: Did Rate Counsel seek information in this proceeding that enabled you to analyze**
12 **Rockland’s customer service?**

13 A: Yes. However, Rockland was unable to provide information that is specific to New
14 Jersey relative to some of the metrics that I analyzed. In those instances, my analyses are
15 based on data for the combined operations of Rockland in New Jersey and O&R in New
16 York. I analyzed various aspects of Rockland’s customer service including its
17 responsiveness to customers’ calls, billing accuracy, meeting customer appointments,

² Rockland Electric Company Marketing Outreach Plan: Energy Assistance Programs, at 1 (provided as attachment to RCR-CI-64.d).

³ When asked to “identify any and all customer service metrics that the Company tracks in compliance with Board rules and orders,” Rockland replied: “The [Board] has not defined or mandated any specific metrics that the Company must follow.” Company response to RCR-CI-14.

⁴ Company response to RCR-CI-68.a

1 timeliness of meter reading, customer complaints to the Board, participation in financial
2 energy assistance programs, deferred payment arrangements, disconnections for non-
3 payment and customer satisfaction. I discuss each of these metrics and summarize my
4 recommendations in Table 4 in Section IV, below.

5 **Q: Has the Board established any customer service metrics that the Company must**
6 **follow?**

7 A: No.⁵ In fact, the Company indicates that it “does not track any metrics,” and did not
8 provide any internal annual targets for its customer service.⁶

9 **Q: Does the Company report any aspects of its customer service to the New York**
10 **Public Service Commission?**

11 A: Yes. Initially, it is important to consider the specific NYPSC standards within the
12 context of O&R’s overall customer service performance obligations to the NYPSC.
13 There are financial consequences in New York if O&R fails to meet various customer
14 service requirements,⁷ and, for this reason, I believe that the NYPSC-established
15 standards, while informative, are far more lenient than would be appropriate in New
16 Jersey where financial consequences for utilities’ sub-par performance do not typically
17 exist. Indeed, the NYPSC customer service standards for O&R are both more limited and
18 more lenient than customer service standards the Board has set for another New Jersey
19 utility company, PSE&G. The Board requires that PSE&G track and report its
20 performance on seven customer service metrics for its electric customers.⁸ For six of

⁵ Company response to RCR-CI-14.

⁶ Company response to RCR-CI-15.

⁷ See attachment to response to RCR-CI-63 a., entitled “Orange and Rockland Utilities, Inc., Cases 18-E-0067 & 18-G-0068, Customer Service Performance Incentive Mechanism.”

⁸ I/M/O the Petition of Public Service Electric and Gas Company for Approval of an Increase in Electric and Gas Rates and for Changes in the Tariffs for Electric and Gas Service, B.P.U.N.J. No. 16 Electric and B.P.U.N.J. No. 16

1 these customer service metrics, PSE&G must meet numerical standards.⁹ The
2 performance standards are significantly stricter than the standards the NYPSC has linked
3 to O&R’s financial penalties.

4 **Q: Please briefly summarize the elements of O&R’s customer service requirements**
5 **imposed by the NYPSC.**

- 6 • O&R submits an annual report to the NYPSC summarizing its customer service
7 performance on four metrics (each of which has NYPSC-established standards):
8 customer satisfaction; complaint rate per thousand customers; percent of calls
9 answered within 30 seconds; and residential disconnections for non-payment (and
10 uncollectibles).¹⁰ The NYPSC may impose financial consequences (involving a
11 revenue adjustment) on O&R if its customer service performance on these metrics
12 is inadequate.¹¹
- 13 • O&R contracts with a third-party vendor to conduct a monthly Customer Contact
14 Satisfaction Survey and reports the results to the NYPSC as the “customer
15 satisfaction” metric. The NYPSC expects O&R’s customer satisfaction score to

Gas, and for Changes in Depreciation Rates Pursuant to N.J.S.A. 48:2-18, N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1 and for Other Appropriate Relief, BPU Docket Nos. ER18010029 and GR18010030, OAL Docket No. PUC 01151-18, *Decision and Order Adopting Initial Decision and Stipulation*, October 29, 2018 (“2018 PSE&G Order”), pages 7-8 and Attachment F. See also I/M/O the Petition of Public Service Electric and Gas Company for Approval of an Increase in Electric and Gas Rates and for Changes in the Tariffs for Electric and Gas service, B.P.U.N.J. No. 14 Electric and B.P.U.N.J. No. 14 Gas Pursuant to N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1 and for Approval of a Gas Weather Normalization Clause; a Pension Expense Tracker and for Other Appropriate Relief, *Decision and Order Approving Stipulation and Adopting Initial Decision for Electric Division*, BPU Docket No. GR09050422, OAL Docket No. PUCRL-07599-2009N, June 7, 2010 (“2010 PSE&G Order”); see also id., “Stipulation of Settlement,” at 9-10 (paragraph 10), and Attachment B to Stipulation.

⁹ Id.

¹⁰ Attachment to Company response to RCR-CI-63.a., entitled “Orange and Rockland Utilities, Inc., Cases 18-E-0067 & 18-G-0068, Customer Service Performance Incentive Mechanism.”

¹¹ Id., at 1.

- 1 exceed 92.6 percent.¹²
- 2 • The NYPSC expects O&R’s customer complaint rate not to exceed one per
- 3 thousand customers.¹³
- 4 • The NYPSC expects O&R to answer no less than 58.3 percent of customer calls
- 5 within 30 seconds, with that standard increasing over a three-year period to 60.3
- 6 percent.¹⁴
- 7 • Also, pursuant to the Stipulation approved by the NYPSC, O&R must meet
- 8 certain standards relating to levels of residential service terminations and
- 9 uncollectible amounts.¹⁵

10 **Q: Do other New Jersey electric utilities submit information regarding their customer**
11 **service to Board Staff and Rate Counsel?**

12 A: Yes.¹⁶

- 13 • ACE: The Board has repeatedly reiterated its oversight of ACE’s customer service in
- 14 many Orders, requiring ACE to report the level of its customer service, as measured
- 15 by various metrics including its efforts to assist customers pay their bills.¹⁷

¹² Id., at 5.

¹³ Id.

¹⁴ Id.

¹⁵ Id., at 3-4.

¹⁶ Although I do not refer specifically to gas utilities’ customer service requirements in my testimony, gas utilities also routinely report customer service performance to Board Staff and Rate Counsel relative to similar metrics (e.g., call answer time, service appointments met, consumer complaints, participation in low-income financial assistance programs). I recognize that gas utility call response time standards must be quicker due to the risk of gas leaks. Nevertheless, regardless of whether customers are purchasing electricity or gas, all regulated utilities must provide safe, proper and adequate customer service.

¹⁷ Petition of ACE, Connectiv Communications, Inc. and New RC, Inc. for Approval under N.J.S.A. 48:2-51.1 and N.J.S.A. 48:3-10 of a Change in Ownership and Control, BPU Docket No. EM01050308, BPU *Order of Approval*, June 19, 2002 (PHI acquisition of all common stock of Connectiv, the corporate parent that owned all the common stock of ACE), 2002 N.J. PUC LEXIS 291 pp. *90 & *97-101, 219 P.U.R. 4th 235 (“2002 Connectiv-Pepco Merger Order”); I/M/O Petition of Atlantic City Electric Company for Approval of Amendments to its Tariff to Provide for

- 1 • PSE&G: In its Order earlier this year approving a Stipulation in PSE&G’s most
2 recent base rate case, the Board reconfirmed its oversight of PSE&G’s customer
3 service. For PSE&G’s electric and gas service, the Board set specific numerical
4 standards for six customer service metrics, and required PSE&G to track its
5 performance on a seventh metric (average speed of call answer). The Board also set a
6 specific numerical standard for PSE&G’s gas service (gas leak/odor response time).¹⁸
7 PSE&G must report to the Board its performance on all eight customer service
8 metrics.

9
10 I rely, in part, on these prior Board directives regarding standards, metrics and reporting
11 to support my recommendations for similar Board directives for Rockland.¹⁹

an Increase in Rates and Charges for Electric Service pursuant to N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1 and for other Appropriate Relief and I/M/O an Audit of the Affiliated Transactions between ACE and Pepco and Management Audit of ACE, BPU Docket Nos. ER09080664 and EA07100794, *Phase 2 Order Approving Stipulation* (May 16, 2011) (“2009 ACE Base Rate Case Order, Phase 2”), p.3; I/M/O the Merger of Exelon Corp. and Pepco Holdings, Inc., BPU Docket No. EM14060581, *Order Approving Stipulation of Settlement*, March 16, 2015 (“2015 Exelon-Pepco Merger Order”). See also I/M/O Petition of Atlantic City Electric Company for Approval of Amendments to its Tariff to Provide for an Increase in Rates and Charges for Electric Service Pursuant to N.J.S.A. 48:2-21 And N.J.S.A. 48:2-21.1 and for Other Appropriate Relief, BPU Docket No. ER18080925, *Decision and Order Adopting Initial Decision and Stipulation of Settlement*, March 13, 2019, *Stipulation of Settlement*, ¶ 13 (“2019 ACE Order”).

¹⁸ *2018 PSE&G Order*. See id., pages 7-8 and Attachment F.

¹⁹ In contrast with its directives to ACE and PSE&G, I am unaware of any Board directives to Jersey Central Power regarding customer service reporting. See, e.g., I/M/O the Verified Petition of Jersey Central Power & Light Company for Review and Approval of Increases in and Other Adjustments to, its Rates and Charges for Electric Service, and for Approval of Other Proposed Tariff Revisions in Connection Therewith (“2016 Base Rate Filing”), BPU Docket ER16040383, *Order Adopting Stipulation*, December 12, 2016.

1 **III. CALL ANSWERING PERFORMANCE NEEDS**
2 **IMPROVEMENT.**

3 ***Background***

4 **Q: Does Rockland operate its own call centers?**

5 A: No. Rockland relies on two call centers, both located in New York.²⁰ Also, through its
6 corporate affiliate, Con Edison, Rockland has contracted with an outside vendor
7 (Alorica)²¹ to provide customer service representatives to answer customer calls to assist
8 the Company with managing increased call volumes.²² Rockland does not have any
9 operating employees, so O&R’s representatives, call centers, and customer service
10 centers serve Rockland’s customers.²³

11 **Q: In your view, is Rockland’s responsiveness to customers’ telephone calls adequate?**

12 A: No. Based on my review of data that Rockland provided regarding two different metrics,
13 which I discuss below, and a comparison with data from two other New Jersey utilities, I
14 conclude that Rockland’s call answer quality needs improvement.

15 **Q: Which two metrics did you analyze?**

16 A: I analyzed Rockland’s average speed of answer (“ASA”) and its call abandonment rate.

17 **Q: Please describe these two metrics.**

18 A: The ASA measures the time (expressed in seconds) it takes for a customer service
19 representative to answer a call from a customer. The call abandonment rate is the percent
20 of calls to the Company that customers abandon, typically when the wait time is long.

²⁰ Company response to RCR-CI-1.

²¹ Company response to RCR-CI-5d.

²² Company response to RCR-CI-5b.

²³ Company response to RCR-CI-6.

1 **Q: You stated that O&R handles calls on a combined, two-state basis. Is the**
2 **information that Rockland provided Rate Counsel regarding the ASA and**
3 **abandonment rate representative of Rockland’s (as a stand-alone company)**
4 **customers’ experience?**

5 A: Not necessarily. In New York, O&R provides gas as well as electric service; Rockland
6 provides only electric service. Because of the additional public safety concerns relating
7 to phone calls about gas service, O&R may respond more quickly to calls coming in from
8 New York phone numbers or involving gas leaks, leaving Rockland’s customer calls to
9 wait longer. Separate reporting of call answer times will allow the Board to evaluate this
10 measurement of Rockland’s customer service; however, this information was not
11 provided.

12 ***Average speed of answer***

13 **Q: Please summarize your analysis of Rockland’s ASA.**

14 A: Table 1, below shows that, between 2014 and 2019, Rockland’s best annual average
15 speed of answer was 72 seconds during 2016, and since then it has deteriorated, with an
16 annual average speed of answer spiking to 1,991 seconds (i.e. over 33 minutes) in 2018,
17 and falling back to a still very high 194 seconds (almost three and a half minutes) in the
18 first half of 2019. As I discuss below, Rockland attributes this deterioration to various
19 causes, but for at least some of the Company’s reasons -- such as its deployment of
20 Advanced Metering Infrastructure (“AMI”) and its implementation of modifications to its
21 web site²⁴ -- it would seem the Company could have anticipated and prepared for
22 increased call volumes. In comparison, during the first two quarters of 2019, PSE&G’s
23 average speed of answer was 74 seconds and 95 seconds, respectively, and during the

²⁴ Company response to RCR-CI-59.

1 first quarter of 2019, ACE’s average speed of answer was 4 seconds.²⁵

2
3
4
5
6

Table 1²⁶
Rockland
Average Speed of Answer (seconds)

2014	81
2015	75
2016	72
2017	102
2018	1,991
2019 YTD	194

7
8

9 **Q: What do you recommend regarding the ASA metric?**

10 A: Presently, the Board requires ACE and PSE&G to report their ASA.²⁷ I recommend that
11 the Board similarly require Rockland to track and report its average speed of answer to
12 Board Staff and Rate Counsel. Regarding an expected standard for Rockland’s ASA
13 performance, Rockland itself indicated that “assuming normal operating conditions and
14 normal staffing levels, it could feasibly achieve an ASA below 75 seconds going
15 forward.”²⁸ I recommend that the Board set an initial ASA standard not to exceed 75
16 seconds for Rockland. This data should be reported for Rockland only, and not combined
17 with O&R data.

²⁵BPU Docket No. GR09050422, “Customer Service Metrics Quarterly Report – 2nd Quarter 2019,” July 26, 2019 (“PSE&G 2nd Quarter 2019 Customer Service Report”); BPU Docket No. ER09080664, “Atlantic City Electric Company’s Quarterly Update on the Effectiveness of the Customer Service Improvement Plan (CSIP) and Reliability Improvement Plan (RIP),” June 19, 2019, Excel attachment entitled “Customer Courtesy Centers (1st Qtr 2019)” (“ACE 1st Quarter Customer Service Report”). ACE’s ASA is remarkably low, and the reasons for that extremely timely call performance are not stated in its quarterly report.

²⁶ Company response to RCR-CI-3.

²⁷ 2018 PSE&G Order; 2009 ACE Base Rate Case Order, Phase 2.

²⁸ Company response to RCR-CI-59.h.

1 **Call abandonment rate**

2 **Q: Did you analyze Rockland’s call abandonment rate?**

3 A: Yes. Table 2, below, shows that Rockland’s annual average call abandonment rate was
4 less than 6 percent in each of the years 2014 through 2016, and increased significantly
5 since then to 8.9 percent in 2017 and 34.9 percent in 2018. By comparison, PSE&G’s
6 call abandonment rates in the first two quarters of 2019 were 4.7 percent and 6.3 percent,
7 respectively.²⁹

8
9 **Table 2³⁰**
10 **Rockland**
11 **Call Abandonment Rate**
12

2014	5.5%
2015	5.2%
2016	5.6%
2017	8.9%
2018	34.9%
2019 YTD	17.8%

13
14 **Q: Should the Board require Rockland to report its call abandonment rate to Board**
15 **Staff and Rate Counsel?**

16 A: Yes. The call abandonment rate provides valuable information about a company’s
17 quality of answering calls. When Rockland’s customers call the Company for service,
18 and then hang up because they have been on hold too long, they are not receiving
19 adequate customer service.

20

²⁹ PSE&G 2nd Quarter 2019 Customer Service Report.

³⁰ Company response to RCR-CI-3. Year-to-date for 2019 is through mid-June.

1 **Q: Do you propose a specific standard for Rockland’s call abandonment rate?**

2 A: Yes. The Company states: “Assuming normal operating conditions and normal staffing
3 levels, it could feasibly achieve a call abandonment rate below 8 percent going
4 forward.”³¹ However, the Company fails to demonstrate persuasively why an
5 abandonment rate of 8 percent should be deemed acceptable by the Board, especially
6 when, as Table 2 above shows, the Company achieved call abandonment rates of less
7 than 6 percent between 2014 through 2016. Instead, consistent with the Board’s directive
8 to PSE&G,³² and consistent with levels that Rockland has demonstrated it has been able
9 to meet in the past,³³ the Board should establish a call abandonment rate not to exceed six
10 (6) percent for Rockland.

11 ***The Company fails to explain adequately its poor call answering***
12 ***performance.***

13
14 **Q: Did the Company explain adequately its poor customer service regarding answering**
15 **customers’ calls as measured by the long average speed of answer and the high call**
16 **abandonment rate?**

17 A: No. Rockland’s explanation does not justify the many consecutive months that
18 customers were unable to reach customer service representatives reliably.³⁴ The

³¹ Company response to RCR-CI-59.g.

³² 2018 PSE&G Order.

³³ See Table 2.

³⁴ See Company response to RCR-CI-3 for monthly performance data. Between January 2018 and April 2019, the average speed of answer exceeded 190 seconds (and was frequently significantly higher) and the call abandonment

1 Company attributes slow response times and high abandonment rates to “its
2 implementation of the [AMI] Program; Solar Billing Inquiries; Scams; High Bill
3 inquiries; Adverse Weather; and Website Upgrades that Required Assistance.”³⁵ This
4 explanation suggests a case of the left hand of the Company not knowing what the right
5 hand of the Company was doing. Particularly, in anticipation of programs specifically
6 under the Company’s control (its AMI Program and website upgrades, for example), the
7 Company could have taken certain measures such as increasing staffing at its call centers
8 in anticipation of increased call volumes.

9 ***Percent of calls answered within 30 seconds***
10

11 **Q: Are there any other standard metrics regarding call answer quality that the Board
12 should require Rockland to report?**

13 A: Yes. It is standard for utilities to report the percent of calls that they answer within a
14 certain period of time, for example, within 30 seconds.³⁶

15 **Q: Did you analyze Rockland’s performance relative to this metric?**

16 A: No. Rockland indicated that it does not track the percent of calls that it answers within
17 30 (or 60 or 90) seconds.³⁷ Rockland also did not indicate whether it is capable of such
18 measurement. However, Rockland indicated that O&R reports to the NYPSC the percent

rate exceeded 15 percent (and was frequently significantly higher). Id.

³⁵ Company response to RCR-CI-59.

³⁶ 2018 PSE&G Order; 2009 ACE Base Rate Case Order, Phase 2.

³⁷ Company response to RCR-CI-3.

1 of calls to its combined O&R / Rockland call centers that are answered within 30
2 seconds.³⁸

3 **Q: Do you propose a specific standard for Rockland’s calls answered within 30**
4 **seconds?**

5 Consistent with PSE&G’s and ACE’s reporting requirements, Rockland also should
6 report the percent of calls that it answers within 30 seconds to Board Staff and Rate
7 Counsel.³⁹ Consistent with the Board-established standard for PSE&G, I recommend that
8 the Board set a standard that Rockland answer at least 80 percent of calls within 30
9 seconds. This data and standard should be set and reported for Rockland only, not
10 combined with O&R data.

11 ***Summary of call answer metrics***
12

13 **Q: Please summarize your recommendations regarding call answer performance**
14 **metrics and standards.**

15 A: I recommend that, consistent with its directives to PSE&G and ACE, the Board direct
16 Rockland to report three measurements of the quality of its call response time and that the
17 Board establish benchmarks for each of these three metrics. Specifically I recommend
18 that Rockland not exceed 75 seconds for its average speed of answer, not exceed a call

³⁸ The NYPSC defines a utility’s “call answer rate” as “the percentage of calls answered by a company representative within 30 seconds of the customer’s request to speak to a representative between the hours of 8 a.m. and 4:30 p.m. Monday through Friday (excluding holidays). The performance rate is the sum of the system-wide number of calls where a customer requests to speak with a representative.” Attachment to Company response to RCR-CI-63.a., entitled “Orange and Rockland Utilities, Inc., Cases 18-E-0067 & 18-G-0068, Customer Service Performance Incentive Mechanism,” p. 3.

³⁹ *2018 PSE&G Order; 2009 ACE Base Rate Case Order, Phase 2.*

1 abandonment rate of six (6) percent, and answer at least 80 percent of calls within 30
2 seconds. These benchmarks may need adjustment in the future if they no longer provide
3 adequate customer service.

4 **IV. THE BOARD SHOULD ESTABLISH COMPREHENSIVE**
5 **CUSTOMER SERVICE REPORTING AND STANDARDS**
6 **FOR ROCKLAND.**

7 **Overview**

8 **Q: Should Rockland report to Board Staff and Rate Counsel regarding any other**
9 **aspects of its customer service?**

10 A: Yes. I recommend that the Board establish comprehensive customer service reporting
11 requirements for Rockland. In addition to the three call answer metrics that I describe in
12 Section III, above, Rockland should report on seven more customer service metrics:
13 meter reading, billing accuracy, service appointments met, customer complaints, numbers
14 of participants in financial assistance programs, numbers of customer disconnections, and
15 information about deferred payment arrangements. This reporting should include data for
16 Rockland specifically, not combined with O&R data.

17 **Q: Why do you recommend that the Board require Rockland to report its performance**
18 **relative to these ten metrics to Board Staff and Rate Counsel?**

19 A: Comprehensive reporting is essential to enable the Board to ensure that: (1) the Company
20 provides safe, proper and adequate service; and (2) service quality does not decline.
21 Holding utilities accountable to oversight increases the probability that service quality
22 will not deteriorate. Other utilities, in New Jersey and in other states, provide the Board
23 or their equivalent state regulatory agency with comprehensive information. It makes
24 equal sense for Rockland to be held to Board-established standards to prevent

1 deterioration and ensure adequate customer service.

2 ***Meter reading***

3 **Q: What do you recommend regarding meter reading?**

4 A: The percentage of Rockland’s meters read declined from 87% in 2018 to 70% for the
5 time period spanning January through May 2019.⁴⁰ Rockland explained both the decline
6 in its performance on this standard, and its anticipated future improved performance, with
7 reference to its AMI system deployment: According to the Company, “manual meter
8 reading [took] longer to complete because there were longer distances between meters,
9 i.e., it was less efficient to read the remaining meters manually,” and “since the AMI
10 meter deployment is now complete this should no longer be an issue.”⁴¹ I am unable to
11 speculate about the possible future benefits, if any, from Rockland’s deployment of AMI.
12 Nevertheless, Rockland’s expectation that AMI will improve its meter reading rate
13 suggests that the Company should be able to read at least 95 percent of meters on cycle.
14 This standard also is consistent with the Board’s directive to PSE&G.⁴² However, now
15 that Rockland has installed AMI, if that technology performs as promised, the
16 Company’s meter reading rate should be 100%.

17 ***Billing accuracy***

18 **Q: Did Rate Counsel seek information regarding the accuracy of the bills that**
19 **Rockland renders to its customers?**

20 A: Yes. Rate Counsel requested information about the number of “re-bills” – that is, the
21 number of instances where, due to inaccuracies, the Company needed to re-issue bills to

⁴⁰ Company response to RCR-CI-19.

⁴¹ Company response to RCR-CI-69.

⁴² 2018 PSE&G Order.

1 customers; however, the Company indicated that it would require a “special study” to
2 measure customer re-bills.⁴³ By contrast, as directed by the Board,⁴⁴ PSE&G routinely
3 reports the number of re-bills per 1,000 customers.⁴⁵

4 **Q: What do you recommend to ensure that Board Staff and Rate Counsel are kept**
5 **informed about the accuracy of Rockland’s billing?**

6 A: The Board should direct Rockland to explain in detail why it needs to conduct a “special
7 study” to measure customer re-bills and also should specify the one-time expenses,
8 recurring expenses, and calendar time associated with so doing.

9 **Q: Assuming that Rockland’s measurement of customer re-bills would not require the**
10 **Company to incur excessive expenses, do you recommend a metric and standard for**
11 **assessing the accuracy of Rockland’s billing?**

12 A: Yes. The metric and associated standard established by the Board for PSE&G should be
13 similarly adopted for Rockland. Consistent with the Board’s directive to PSE&G,
14 Rockland should have no more than 20 re-bills per 1,000 customers.⁴⁶

15 ***Service appointments met***

16 **Q: Please describe your recommendation regarding service appointments.**

17 A: Board rules require that a customer appointment must be met within a four-hour
18 window.⁴⁷ The Company meets well over 95 percent of its service appointments,⁴⁸ and

⁴³ Company response to RCR-CI-19.f.

⁴⁴ 2018 PSE&G Order.

⁴⁵ See, e.g., PSE&G 2nd Quarter 2019 Customer Service Report.

⁴⁶ 2018 PSE&G Order.

⁴⁷ N.J.A.C. 14:3-3.8.

⁴⁸ The spreadsheet produced with the Company’s response to RCR-CI-70 (“O&R Appointment Kept 2015 thru 2019 YTD”) includes data suggesting unacceptably low percentages of service appointments met during 2019. However, the Company subsequently provided revised data that excludes appointments for Orange and Rockland’s gas customers. That revised data shows that Orange and Rockland met, on average, 97.4 percent of its electric customer

1 the Board set a standard of 95 percent for PSE&G.⁴⁹ For these reasons, I propose a
2 standard of 95 percent for Rockland.

3 ***Customer complaints***

4 **Q: Please describe the significance of customer complaints as a measure of customer**
5 **service.**

6 A: Customer complaints are a well-accepted measure of customer satisfaction with a
7 company, which is related to their experience with the company.⁵⁰ The frequency of
8 customer complaints to the Board is valuable information that reflects the quality of a
9 utility's customer service and may signal areas where improvements are needed. The
10 Board requires ACE and PSE&G to report information relating to customer complaints.⁵¹
11 Because it is important to monitor the level and reasons for customer complaints as a way
12 to detect aspects of the Company that may need improvement, it is equally fitting for
13 Rockland to be required to provide similar information to Board Staff and Rate Counsel.

14 **Q: What, then, do you recommend that the Company report to Board Staff and Rate**
15 **Counsel about its customer complaints?**

16 A: The Board should direct Rockland to submit information about the numbers of customer
17 complaints to the Board, a categorization of the types of complaints (e.g., billing,
18 appointments, calls to call center, etc.), and the complaint rate (i.e., the number of
19 complaints per 1,000 customers).

appointments during the six-month period spanning January through June 2019. Company response to RCR-CI-
INF, Question No. 3, Excel file entitled "Appointments Kept 2013 – 2019 Excluding Gas Appts."

⁴⁹ 2018 PSE&G Order.

⁵⁰ There are other measures of customer satisfaction, such as surveys, which I discuss later in my testimony.

⁵¹ 2002 *Connectiv-Pepco Merger Order ACE Rate Case Order, Phase 2; I/M/O the Merger of Exelon Corp. and Pepco Holdings, Inc.* (see page 13); 2018 PSE&G Order.

1 **Q: What metric and standard do you propose to enable Board Staff and Rate Counsel**
2 **to monitor trends in customer complaints?**

3 A: I recommend that the Board use a “complaint rate” metric expressed as the number of
4 complaints to the Board per thousand customers, which is consistent with the metric the
5 Board uses to monitor PSE&G’s customer service.⁵²

6
7 Rockland provided data corresponding with the twelve months spanning June 1, 2018
8 through June 1, 2019, which enables one to compute Rockland’s actual complaint rate.
9 During this time period, Rockland had 81 customer complaints and 80,177 customers.⁵³
10 Dividing the former number by the latter yields 1.01 complaints per thousand customers,
11 that is, approximately one complaint per thousand customers.

12
13 I recommend that the Board set a standard for Rockland of one complaint per thousand
14 customers, which is consistent with the standard set by the Board for PSE&G,⁵⁴ and
15 seemingly readily achievable based on Rockland’s recent performance.⁵⁵

16 ***The Company should report its performance relative to three metrics***
17 ***associated with preventing residential disconnection for non-***
18 ***payment.***

19
20 **Q: How many residential customers has Rockland recently disconnected for non-**
21 **payment?**

⁵² 2018 PSE&G Order, Attachment F.

⁵³ Attachment to Company response to RCR-CI-25 entitled “RECO RCR-CI-25 2019xls.”

⁵⁴ 2018 PSE&G Order, Attachment F.

⁵⁵ Attachment to Company response to RCR-CI-25 entitled “RECO RCR-CI-25 2019xls.”

1 A: Residential disconnections for non-payment increased from 84 in 2018 to 356 in 2019,⁵⁶
2 which the Company attributes to its “increased focus on NJ accounts in arrears.”⁵⁷
3 Collecting past due amounts is not, per se, unreasonable, but the fact that accounts are in
4 arrears indicates that customers are having a hard time paying their utility bills, and may
5 benefit from deferred payment arrangements (“DPAs”). The increase in residential
6 disconnections for non-payment also seems inconsistent with Rockland’s assertion,
7 discussed below, that fewer of its customers are participating in financial assistance
8 programs such as USF because the economy is improving.

9 **Q: Please discuss further the trends in disconnections of Rockland’s customers for non-**
10 **payment and your recommendation for reporting regarding disconnections.**

11 A: Although the magnitude of disconnections in 2019 is far less than the more than 600
12 annual disconnections that occurred in each of the years 2013 through 2016,⁵⁸ the
13 quadrupling of disconnections between 2018 and 2019 is troubling. Therefore,
14 continuing oversight of disconnection trends by Board Staff and Rate Counsel is
15 essential, especially given the volatility of the numbers of disconnections, the importance
16 of minimizing residential disconnections, and the relationship among disconnections,
17 DPAs, and participation in financial assistance. I recommend that Rockland report
18 disconnection data to enable Board Staff and Rate Counsel to monitor disconnection
19 trends, and seek explanations from the Company if and as needed.

⁵⁶ Company response to RCR-CI-31.

⁵⁷ Company response to RCR-CI-76.b.

⁵⁸ Company response to RCR-CI-31.

1 **Q: Are there ways to measure the Company's efforts to minimize residential**
2 **disconnections for non-payment and its success in so doing?**

3 A: Yes. Participation in financial assistance programs helps customers to pay their bills and
4 so avoid disconnection for non-payment. The Company, through its outreach and
5 education, can facilitate its customers' enrollment in various financial assistance
6 programs. I consider information about the numbers of participants per program,
7 collectively, to represent the first of three metrics that I propose in this category of
8 customer service metrics.

9
10 The Company also helps customers prevent disconnection for non-payment by offering
11 DPAs, which allow customers to pay amounts in arrears over many months, through an
12 installment plan. Various data about the DPAs that the Company offers its customers
13 collectively represent the second metric in this category that I propose.

14
15 Finally, my third proposed metric corresponds with the number of residential customers
16 that the Company disconnects for non-payment. The more successful that the financial
17 assistance programs and DPAs are, all else being equal, the lower the number of
18 residential disconnections.

19
20 Information about Rockland's performance on these three metrics, each of which I
21 discuss below, will enable Board Staff and Rate Counsel to monitor the Company's
22 efforts and success in minimizing residential disconnections for non-payment.

1 **Q: Regarding your first recommended metric in this category of metrics, did you**
 2 **analyze the level of participation by Rockland’s customers in financial assistance**
 3 **programs?**

4 **A:** Yes. Table 3, below, shows that participation by Rockland customers in financial
 5 assistance programs has been declining, which indicates that ongoing monitoring by the
 6 Board is warranted. For example, the number of USF participants decreased between
 7 2013 and 2018 by 19 percent, from 718 to 578, and the number of Lifeline participants
 8 declined over the same time period by 23 percent, from 675 to 520.

9 **Table 3**
 10 **Participation by Rockland Customers in Low-Income Assistance Programs: 2013 - 2019⁵⁹**
 11
 12

Program	2013	2014	2015	2016	2017	2018	2019
USF	718	649	691	627	616	578	568
NJ Lifeline	675	617	551	596	593	520	180
LIHEAP	N/A	166	129	248	198	254	195
NJ Shares	4	0	2	5	7	1	4
PAGE	N/A	5	5	2	4	12	5
TRUE	6	8	1	1	8	Program Closed	

13
 14
 15 **Q: Is the Company conducting outreach to its customers about energy assistance and**
 16 **energy efficiency programs?**

⁵⁹ Company responses to RCR-CI-33, Excel attachment entitled “RCR-CI-33,” tab entitled “CR-CI-6a” (USF customers) and RCR-CI-75, Exhibit 1 (all other assistance programs). USF data is number of customers. 2019 USF customers is projection based on May 2019 actual; N/A indicates data not available.

1 A: Yes. The Company is conducting outreach about energy assistance programs, as well as
2 programs to help customers reduce their overall energy bills.⁶⁰ The Company states that
3 its “Low Income Direct Install” programs, which provide participants with, among other
4 things, free energy audits and free installation of electric efficiency measures, have
5 resulted in decreased electricity use, which, in turn, helps customers pay bills. Rockland
6 also asserts that an improving economy may explain in part declining USF
7 participation.⁶¹

8
9 Efforts to help customers adopt energy efficiency measures are an important method to
10 reduce customers’ bills and increase their affordability. Nonetheless, given the
11 importance of preventing residential disconnections for non-payment and the recent rise
12 in Rockland’s disconnections discussed below, it is important for the Company to
13 provide information to Board Staff and Rate Counsel about enrollment in financial
14 assistance programs, which can be examined along-side information about residential
15 disconnections for non-payment.

16 **Q: Please explain how DPAs help customers with amounts in arrears avoid**
17 **disconnection for non-payment.**

⁶⁰ See, e.g., “Rockland Electric Company Marketing Outreach Plan: Energy Assistance Programs” provided as an attachment to response to RCR-CI-64.d. The Company also states that it “has undertaken several initiatives to address the decline in customer awareness of assistance programs” and that those “include social media, press releases, bill inserts, and IVR outbound phone calls, all of which were implemented throughout 2018.” Company response to RCR-CI-64.d. See also responses to RCR-CI-75 and RCR-CI-77.

⁶¹ Company response to RCR-CI-INF, Question No. 2.

1 A: When customers owe significant sums of money to the Company, DPAs allow them to
2 spread the amount due over a period of time in monthly installments which, in turn,
3 increases the chance that these customers will eventually pay their utility bills and so
4 avoid disconnection.

5 **Q: Did you review information about the DPAs that Rockland offers its customers?**

6 A: Yes. For example, in the calendar year 2018, Rockland established 995 DPAs. Based on
7 the time period February 2018 through May 2019, averaging across all DPAs that the
8 Company entered into with its customers to help them re-pay the amount in arrears, the
9 average down payment was \$207.56; the average term was 31 months; the average dollar
10 amount of arrears made subject to a DPA was \$1,051.99, and the average monthly
11 installment was \$73.18.⁶²

12 **Q: Should the Company also report information regarding DPAs to Board Staff and**
13 **Rate Counsel?**

14 A: Yes. DPAs are an important way to help customers pay bills, and so prevent
15 disconnection for non-payment. The Company should submit information showing the
16 numbers of newly established DPAs; the average down payment (in dollars) of DPAs; the
17 average term (in months) of the DPAs; the average dollar amount of arrears made subject
18 to a DPA; the average monthly installment of DPAs; the number of defaulted DPAs; and
19 the number of completed (or “successful”) DPAs.⁶³ Another New Jersey utility (ACE)

⁶² Company response to RCR-CI-42, Excel attachment entitled “DPAs” and tab entitled “RCR-CI-1.”

⁶³ Id.

1 provides similar information regarding DPAs to Board Staff and Rate Counsel, quarterly,
2 as part of its comprehensive “Customer Service Improvement Plan.”⁶⁴

3 **Q: Please summarize your recommended reporting by the Company to Board Staff and**
4 **Rate Counsel regarding metrics for assessing Rockland’s efforts to prevent**
5 **residential customer disconnections for non-payment.**

6 A: Given the importance of minimizing the occurrences of disconnecting customers’
7 electricity, an essential service, I recommend that the Board direct Rockland to include
8 data regarding three aspects of this component of customer service in its semi-annual (i.e.
9 every 6 months) customer service reports to Board Staff and Rate Counsel: (1)
10 information similar to that provided in Table 3, above, summarizing participation levels
11 in financial assistance programs; (2) the information regarding DPAs that I describe
12 above; and (3) the number of residential disconnections for non-payment.

13 ***Customer satisfaction is important***
14

15 **Q: Do electric utilities in New Jersey and around the country typically measure**
16 **“customer satisfaction” and, if so, how do they go about assessing whether**
17 **customers are satisfied with their interactions with their utility?**

18 A: Yes. Rockland and other utilities around the country track the numbers and types of
19 consumer complaints to the Board (and their regulatory counterparts in other states),
20 which I discuss in Section IV, above. Companies throughout the country also conduct

⁶⁴ ACE 1st Quarter 2019 Customer Service Report, attachment entitled “New Jersey Residential, Deferred Payment Arrangement Statistics, Data as of March 31, 2019.”

1 customer surveys to assess satisfaction. For example, ACE conducts “Moment of Truth”
2 surveys to measure performance and obtain feedback regarding transactions such as
3 service calls related to outages, service problems, and calls handled by the call center.
4 Telephone surveys are conducted with a random sample of customers on a weekly basis,
5 within ten days of their service interaction, and ACE analyzes results in order to identify
6 areas for improvement.⁶⁵ O&R submits the results of its monthly “Customer Contact
7 Satisfaction Survey” to the NYPSC, which is based on a ten-point scale used by an
8 outside vendor to rank customer satisfaction with O&R’s performance based upon a
9 series of questions and an overall customer satisfaction index question.⁶⁶ Customer
10 surveys measure customer satisfaction and assist utilities throughout the country in
11 identifying areas for improvement.

12 **Q: Does Rockland measure its customers’ satisfaction?**

13 A: Yes, through its contract with J.D. Power. However, those surveys are based on the
14 combined operations of O&R and Rockland and so do not specifically assess New Jersey
15 customers’ satisfaction with Rockland.

16 **Q: Please briefly describe the J.D. Power surveys.**

17 A: J.D. Power conducts surveys of utility customers⁶⁷ including, among others, the “JD
18 Power Electric Utility Residential Customer Satisfaction SurveySM”, which measures

⁶⁵ “ACE Moment of Truth Survey Report, First Quarter 2019,” page 1.

⁶⁶ Company response to RCR-CI-63; Orange and Rockland’s NYPSC Customer Service Performance Mechanism.

⁶⁷ As described on its website, “J.D. Power provides actionable market intelligence to electric, natural gas, and water utilities serving consumers and businesses throughout the United States. J.D. Power’s industry experts help these businesses measure and manage performance for ongoing improvement.”
<https://www.jdpower.com/business/industry/utilities>, site visited September 29, 2019.

1 residential customer satisfaction with large and midsize electric utility companies in four
2 U.S. regions.⁶⁸ However, without seeing the underlying questions posed to customers, I
3 cannot assess whether the J.D. Power survey encompasses all of the issues that I raise
4 with reference to the ten customer service metrics that I propose. For this reason, the J.D.
5 Power results are informative but not dispositive.

6 **Q: Recognizing this limitation, did you nonetheless review the most recent J.D. Power**
7 **survey results? If so, please comment.**

8 A: Yes. J.D. Power does not survey Rockland customers separately. As reported by J.D.
9 Power in July 2019, Orange & Rockland ranks eleventh out of twelve mid-sized East
10 companies regarding customer satisfaction, and has trailed other similarly sized
11 companies for four years.⁶⁹

12 **Q: Does J.D. Power assess customers' awareness of financial assistance programs?**

13 A: Yes. J.D. Power results for O&R, dated May 2017, show that customers' "awareness of
14 assistance programs" declined from 39% in 2016 to 28% in 2017.⁷⁰ This finding
15 underscores the importance of Rockland's reporting the metrics I discuss above to
16 prevent residential disconnections for non-payment.

17

⁶⁸ <https://www.jdpower.com/business/resource/electric-utility-residential-customer-satisfaction-study>, site visited September 29, 2019.

⁶⁹ Attachment to Company response to RCR-CI-64.a, page 1. See also, *id.*, at page 4, entitled: "Overall CSI [Customer Service Index] and Factor Performance –Trailing Four Years."

⁷⁰ See attachment to Company response to RCR-CI-12, which are J.D. Power results dated May 2017, labelled "Awareness of Assistance Programs," numbered as page 13 (Rockland's electronic page 53 of 90 in attachment to its response to RCR-CI-12).

1 **Q: What do you conclude based on your review of the J.D. Power results?**

2 A: Although I have not examined the methodology and sampling techniques that J.D. Power
3 uses to assess customer satisfaction, the near rock-bottom ranking of Rockland's affiliate
4 O&R relative to similarly sized electric utilities in the East further supports my overall
5 recommendation that the Board require Rockland to submit comprehensive customer
6 service reporting to Board Staff and Rate Counsel.

7 ***Summary of proposed customer service report***

8 **Q: Have you prepared a summary of your proposed customer service metrics and**
9 **standards?**

10 A: Yes. Table 4, below, summarizes the ten elements of Rockland's service that I
11 recommend the Board require the Company to report and, where applicable, the
12 associated standards. Exhibit SMB-1 to my testimony includes the definitions for each of
13 the seven electric service metrics that the Board requires PSE&G to report that, with the
14 exception of the reference to gas service, should be applicable to Rockland's operations.⁷¹

15 **Q: But other electric utilities serve significantly larger service territories than**
16 **Rockland's New Jersey territory. Why should Rockland, which serves relatively**
17 **fewer customers, be held to similar standards as much larger electric utilities such**
18 **as PSE&G?**

19 A For three reasons. First, regardless of the size of the utility serving them, customers
20 deserve safe, proper and adequate service quality. Second, as I explain earlier, Rockland
21 has the resources to do so. Rockland is owned by Con Edison, a company with more

⁷¹ 2018 PSE&G Order/Stipulation of Settlement, Attachment F.

1 than \$12 billion in revenues.⁷² Third, Rockland’s affiliate O&R already monitors and
 2 reports to the NYPSC certain customer service metrics, with which it must comply, so
 3 familiarity and ability with regard to customer service performance should not be
 4 burdensome.⁷³

5 **Table 4**
 6 **Proposed Customer Service Metrics and Standards**

	Metric	Standard
	Call Answer Quality	
1	% Calls Answered w/in 30 seconds	> 80%
2	Call Abandonment Rate	< 6%
3	Average Speed of Answer	<75 seconds
	Meter Reading	
4	% of Meters Read on Cycle	>95%
	Billing Accuracy	
5	Rebills per 1,000 customers	<=20
	Meeting Appointments	
6	% of Service Appointments Met	>95%
	Customer Satisfaction	
7	Complaints	<1 per 1,000 customers
	Measures to Prevent Residential Disconnections for Non-Payment	
8	Numbers of Residential Disconnections for Non-Payment	Track and Report
9	Participation in Financial Assistance Programs	Track and Report
10	Deferred Payment Arrangements	Track and Report

7

⁷² Con Edison 2018 Annual Report.

⁷³ We note that Rockland also has provided customer service information, combined with O&R data, to the Board’s auditor. Silverpoint Consulting LLC, Final Comprehensive Management Audit of Rockland Electric Company and Audit of Affiliate Relationships and Transactions, July 19, 2019, available at <https://www.bpu.state.nj.us/bpu/pdf/boardorders/2019/20190807/8-7-19-1B.pdf> .

1 **Q: How frequently should Rockland submit customer service reports to Board Staff**
2 **and Rate Counsel?**

3 A: Rockland should submit reports on a semi-annual basis to Board Staff and Rate Counsel.
4 The reports can be streamlined, consisting mainly of Excel-based data, which will enable
5 ongoing trend analysis and comparison with other electric utilities' customer service.

6 **Q: The Company states that it does not have the ability to track customer service**
7 **metrics separately between New York and New Jersey, and instead it tracks**
8 **customer service metric data on a consolidated basis.⁷⁴ Should the Board**
9 **nonetheless require Rockland to report on its New Jersey operations, separately**
10 **from O&R's New York operations?**

11 A: Yes. As to the three metrics associated with minimizing residential disconnections for
12 non-payment (participation in financial assistance programs, number of disconnections,
13 and information about deferred payment arrangements), it is my understanding that the
14 Company provided data in response to Rate Counsel questions that is specific to New
15 Jersey customers and has that capability going forward. Similarly, I interpret the
16 Company's complaint data to encompass only Rockland's New Jersey customers.
17 Regarding the remaining six other metrics (average speed of answer, call abandonment
18 rate, percent of calls answered within 30 seconds, meter reading, billing accuracy, and
19 service appointments met), Rockland has failed to demonstrate why it could not develop
20 a capability to report specifically regarding its service provided to New Jersey customers.
21

⁷⁴ Company response to RCR-CI-68.

1 ***Conclusion***

2 **Q: Does this conclude your testimony?**

3 **A: Yes.**

Attachment A

Statement of Qualifications of Susan M. Baldwin

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Susan M. Baldwin specializes in utility economics, regulation, and public policy, with a long-standing focus on telecommunications and with a more recent focus on consumer issues in electric and gas markets. Ms. Baldwin has been actively involved in public policy for forty-one years, which includes thirty-five years in telecommunications policy and regulation, and eleven years in energy policy and regulation. Since 2001, she has been consulting to public sector agencies, consumer advocates, and others as an independent consultant. Ms. Baldwin received her Master of Economics from Boston University, her Master of Public Policy from Harvard University's Kennedy School of Government, and her Bachelor of Arts degree in Mathematics and English from Wellesley College. Ms. Baldwin has extensive experience both in government and in the private sector.

Ms. Baldwin has testified before 24 public utility commissions in more than 75 state proceedings, including: the Arkansas Public Service Commission, California Public Utilities Commission, Colorado Public Utilities Commission, Connecticut Department of Public Utility Control, District of Columbia Public Service Commission, Idaho Public Utilities Commission, Illinois Commerce Commission, Indiana Utility Regulatory Commission, Iowa Utilities Board, Maryland Public Service Commission, Massachusetts Department of Telecommunications and Cable, Nevada Public Service Commission, New Hampshire Public Utilities Commission, New Jersey Board of Public Utilities, New Mexico Public Regulation Commission, New York Public Service Commission, Public Utilities Commission of Ohio, Pennsylvania Public Utility Commission, Rhode Island Public Utilities Commission, Tennessee Public Service Commission, Vermont Public Service Board, Washington Utilities and Transportation Commission, Public Service Commission of West Virginia and Wyoming Public Service Commission. Ms. Baldwin has also authored numerous comments and declarations submitted in various Federal Communications Commission proceedings.

Ms. Baldwin has also participated in projects in Delaware, Hawaii, Illinois, New York, South Dakota, and Canada on behalf of consumer advocates, public utility commissions, and competitive local exchange carriers. Ms. Baldwin has served in a direct advisory capacity to public utility commissions in the District of Columbia, Massachusetts, New Mexico, Utah and Vermont. Ms. Baldwin has also testified on behalf of public utility commission staff in Idaho and Rhode Island. Ms. Baldwin has testified before state legislative committees in Maryland, Massachusetts, Ohio, and Pennsylvania.

Ms. Baldwin has sponsored expert reports in state taxation proceedings. Also, in her capacity as an independent consultant, Ms. Baldwin has consulted to and testified on behalf of consumer advocates on diverse matters including the electric retail market, consumer protection and consumer services issues in telecommunications, electric, and gas proceedings, broadband

deployment, numbering resources, unbundled network element (UNE) cost studies, incumbent local exchange carriers' requests for competitive classification of services, mergers and spin-offs, rate cases, universal service, service quality, and state *Triennial Review Order* (TRO) proceedings.

Ms. Baldwin sponsored detailed testimony on behalf of the Connecticut Office of Consumer Counsel in 2019 and in 2014 regarding the third-party residential electric market. In her testimony, she summarized her detailed analysis of the prices that retail customers of suppliers pay and her review of consumer complaints regarding the retail electric market. In 2018, Ms. Baldwin co-authored an analysis of Maryland's residential electric and gas supply markets on behalf of the Maryland Office of People's Counsel. She also conducted an in-depth analysis of the retail residential electric market in Massachusetts for the Massachusetts Office of the Attorney General.

Ms. Baldwin has analyzed customer service issues in many electric and gas rate case proceedings on behalf of consumer advocate offices. Ms. Baldwin has worked with local, state, and federal officials on energy and environmental issues. As a policy analyst for the New England Regional Commission (NERCOM) and Massachusetts Office of Energy Resources (MOER), she acquired extensive experience working with governors' offices, state legislatures, congressional offices, and industry and advocacy groups. As an energy analyst for NERCOM, Ms. Baldwin coordinated New England's first regional seminar on low-level radioactive waste, analyzed federal and state energy policies, and wrote several reports on regional energy issues. While working with the MOER, Ms. Baldwin conducted a statewide survey of the solar industry and analyzed federal solar legislation. While attending the Kennedy School of Government, Ms. Baldwin served as a research assistant for the school's Energy and Environmental Policy Center.

Ms. Baldwin has contributed to numerous comments submitted to the FCC on diverse aspects of broadband in various proceedings on topics such as data collection, mapping, deployment, universal service, affordability, consumer protection, and network management. Also, in state regulatory proceedings that have examined carriers' proposals for spin-offs and for mergers, she has recommended conditions concerning broadband deployment.

Ms. Baldwin served as a direct advisor to the Massachusetts Department of Telecommunications and Energy (DTE) between August 2001 and July 2003, in Massachusetts DTE Docket 01-20, an investigation of Verizon's total element long run incremental cost (TELRIC) studies for recurring and nonrecurring unbundled network elements (UNEs). She assisted with all aspects of this comprehensive case in Massachusetts. Ms. Baldwin analyzed recurring and nonrecurring cost studies; ran cost models; reviewed parties' testimony, cross-examined witnesses, trained staff, met with the members of the Commission, assisted with substantial portions of the major orders issued by the DTE; and also assisted with the compliance phase of the proceeding.

Ms. Baldwin has also contributed to numerous comments and declarations submitted to the Federal Communications Commission on issues such as broadband; intercarrier compensation reform; the Comcast-NBCU merger, price cap regulation; universal service; carriers' petitions

for forbearance; separations reform; special access services, relay services; numbering optimization, and the Internet Protocol transition.

Ms. Baldwin worked with Economics and Technology, Inc. for twelve years (1984 to 1988 and 1992 to 2000), most recently as a Senior Vice President. Among her numerous projects were the responsibility of advising the Vermont Public Service Board in matters relating to a comprehensive investigation of NYNEX's revenue requirement and proposed alternative regulation plan. She participated in all phases of the docket, encompassing review of testimony, issuance of discovery, cross-examination of witnesses, drafting memoranda and decisions, and reviewing compliance filings. Another year-long project managed by Ms. Baldwin was the in-depth analysis and evaluation of the cost proxy models submitted in the FCC's universal service proceeding. Also, on behalf of the staff of the Idaho Public Utilities Commission, Ms. Baldwin testified on the proper allocation of US West's costs between regulated and non-regulated services. On behalf of AT&T Communications of California, Inc. and MCI Telecommunications Corporation, Ms. Baldwin comprehensively analyzed the non-recurring cost studies submitted by California's incumbent local exchange carriers. Ms. Baldwin has participated in more than twenty state and federal regulatory investigations of the impact of proposed transfers of control of wireline, wireless and cable companies.

Ms. Baldwin has contributed to the development of state and federal policy on numbering matters. On behalf of the Ad Hoc Telecommunications Users Committee, Ms. Baldwin participated in the Numbering Resource Optimization Working Group (NRO-WG), and in that capacity, served as a co-chair of the Analysis Task Force of the NRO-WG. She has also provided technical assistance to consumer advocates in the District of Columbia, Illinois, Iowa, Massachusetts, and Pennsylvania on area code relief and numbering optimization measures. Ms. Baldwin also co-authored comments on behalf of the National Association of State Utility Consumer Advocates in the FCC's proceeding on numbering resource optimization.

During her first years at ETI, Ms. Baldwin was the Director of Publications and Tariff Research, and, in that capacity, she trained and supervised staff in the analysis of telecommunications rate structures, services, and regulation.

Ms. Baldwin served four years (1988-1992) as the Director of the Telecommunications Division for the Massachusetts Department of Public Utilities (now the Department of Telecommunications & Cable), where she directed a staff of nine, and acted in a direct advisory capacity to the DPU Commissioners. (The Massachusetts DTC maintains a non-separated staff, which directly interacts with the Commission, rather than taking an advocacy role of its own in proceedings). Ms. Baldwin advised and drafted decisions for the Commission in numerous DPU proceedings including investigations of a comprehensive restructuring of the rates of New England Telephone Company (NET), an audit of NET's transactions with its NYNEX affiliates, collocation, ISDN, Caller ID, 900-type services, AT&T's request for a change in regulatory treatment, pay telephone and alternative operator services, increased accessibility to the network by disabled persons, conduit rates charged by NET to cable companies, and quality of service. Under her supervision, staff analyzed all telecommunications matters relating to the regulation of

the then \$1.7-billion telecommunications industry in Massachusetts, including the review of all telecommunications tariff filings; petitions; cost, revenue, and quality of service data; and certification applications. As a member of the Telecommunications Staff Committees of the New England Conference of Public Utility Commissioners (NECPUC) and the National Association of Regulatory Utility Commissioners (NARUC), she contributed to the development of telecommunications policy on state, regional, and national levels.

As a budget analyst for the Massachusetts Department of Public Welfare, Ms. Baldwin forecast expenditures, developed low-income policy, negotiated contracts, prepared and defended budget requests, and monitored expenditures of over \$100 million.

Ms. Baldwin received Boston University's Dean's Fellowship. While attending the Kennedy School of Government, Ms. Baldwin served as a teaching assistant for a graduate course in microeconomics and as a research assistant for the school's Energy and Environmental Policy Center, and at Wellesley College was a Rhodes Scholar nominee. She has also studied in Ghent, Belgium.

Record of Prior Testimony

In the matter of the Application of the New Jersey Bell Telephone Company for Approval of its Plan for an Alternative Form of Regulation, New Jersey Board of Regulatory Commissioners Docket No. T092030358, on behalf of the New Jersey Cable Television Association, filed September 21, 1992, cross-examined October 2, 1992.

DPUC review and management audit of construction programs of Connecticut's telecommunications local exchange carriers, Connecticut Department of Public Utility Control Docket No. 91-10-06, on behalf of the Connecticut Office of the Consumer Counsel, filed October 30, 1992, cross-examined November 4, 1992.

Joint petition of New England Telephone and Telegraph Company and Department of Public Service seeking a second extension of the Vermont Telecommunications Agreement, Vermont Public Service Board 5614, Public Contract Advocate, filed December 15, 1992, cross-examined December 21, 1992.

Application of the Southern New England Telephone Company to amend its rates and rate structure, Connecticut Department of Public Utility Control Docket No. 92-09-19, on behalf of the Connecticut Office of Consumer Counsel, filed March 26, 1993 and May 19, 1993, cross-examined May 25, 1993.

In the matter of the Application of Cincinnati Bell Telephone Company for Approval of an Alternative Form of Regulation and for a Threshold Increase in Rates, Public Utilities Commission of Ohio Case No. 93-432-TP-ALT, on behalf of Time Warner AxS, filed March 2, 1994.

Matters relating to IntraLATA Toll Competition and Access Rate Structure, Rhode Island Public Utilities Commission Docket 1995, on behalf of the Rhode Island Public Utilities Commission Staff, filed March 28, 1994 and June 9, 1994, cross-examined August 1, 1994.

In the Matter of the Application of The Ohio Bell Telephone Company for Approval of an Alternative Form of Regulation, Public Utilities Commission of Ohio Case No. 93-487-TP-ALT, on behalf of Time Warner AxS, filed May 5, 1994, cross-examined August 11, 1994.

In Re: Universal Service Proceeding: The Cost of Universal Service and Current Sources of Universal

Service Support, Tennessee Public Service Commission Docket No. 95-02499, on behalf of Time Warner AxS of Tennessee, L.P., filed October 18, 1995 and October 25, 1995, cross-examined October 27, 1995.

In Re: Universal Service Proceeding: Alternative Universal Service Support Mechanisms, Tennessee Public Service Commission Docket No. 95-02499, on behalf of Time Warner AxS of Tennessee, L.P., filed October 30, 1995 and November 3, 1995, cross-examined November 7, 1995.

In the Matter of the Application of US West Communications, Inc. for Authority to Increase its Rates and Charge for Regulated Title 61 Services, Idaho Public Utilities Commission Case No. USW-S-96-5, on behalf of the Staff of the Idaho Public Utilities Commission, filed November 26, 1996 and February 25, 1997, cross-examined March 19, 1997.

A Petition by the Regulatory Operations Staff to Open an Investigation into the Procedures and Methodologies that Should Be Used to Develop Costs for Bundled or Unbundled Telephone Services or Service Elements in the State of Nevada, Nevada Public Service Commission Docket No. 96-9035, on behalf of AT&T Communications of Nevada, Inc., filed May 23, 1997, cross-examined June 6, 1997.

Rulemaking on the Commission's Own Motion to Govern Open Access to Bottleneck Services and Establish a Framework for Network Architecture; Investigation on the Commission's Own Motion into Open Access and Network Architecture Development of Dominant Carrier Networks, California Public Utilities Commission R.93-04-003 and I.93-04-002, co-authored a declaration on behalf of AT&T Communications of California, Inc., and MCI Telecommunications Corporation, filed on December 15, 1997 and on February 11, 1998.

Consolidated Petitions for Arbitration of Interconnection Agreements, Massachusetts Department of Telecommunications and Energy, DPU 96-73/74, 96-75, 96-80/81, 96-83, and 96-84, on behalf of AT&T Communications of New England, Inc. and MCI Telecommunications Corporation, filed February 3, 1998.

In the Matter of the Application of US West Communications, Inc. for Specific Forms of Price Regulation, Colorado Public Utilities Commission Docket No. 97-A-540T, on behalf of the Colorado Office of Consumer Counsel, filed on April 16, 1998, May 14, 1998 and May 27, 1998, cross-examined June 2, 1998.

Joint Application of SBC Communications and Southern New England Telecommunications Corporation for Approval of a Change of Control, Connecticut Department of Public Utility Control Docket No. 98-02-20, on behalf of the Connecticut Office of Consumer Counsel, filed May 7, 1998 and June 12, 1998, cross-examined June 15-16, 1998.

Fourth Annual Price Cap Filing of Bell Atlantic-Massachusetts, Massachusetts Department of Telecommunications and Energy Docket DTE 98-67, on behalf of MCI Telecommunications Corporation, filed September 11, 1998 and September 25, 1998, cross-examined October 22, 1998.

Applications of Ameritech Corp., Transferor, and SBC Communications, Inc., Transferee, For Consent to Transfer Control, Federal Communications Commission CC Docket No. 98-141, co-sponsored affidavit on behalf of Indiana Utility Consumer Counselor, Michigan Attorney General, Missouri Public Counsel, Ohio Consumers' Counsel, Texas Public Utility Counsel and Utility Reform Network, filed on October 13, 1998.

In the Matter of the Joint Application of SBC Communications Inc., SBC Delaware, Inc., Ameritech Corporation and Ameritech Ohio for Consent and Approval of a Change of Control, Public Utilities Commission of Ohio Case No.98-1082-TP-AMT, on behalf of Ohio Consumers' Counsel, filed on December 10, 1998, cross-examined on January 22, 1999.

GTE Corporation, Transferor, and Bell Atlantic Corporation, Transferee, For Consent to Transfer Control, Federal Communications Commission CC Docket No. 98-184, co-sponsored an affidavit on behalf of a coalition of consumer advocates from Delaware, Hawaii, Maine, Maryland, Missouri, Ohio, Oregon, West Virginia, and Michigan, filed on December 18, 1998.

In the Matter of the Joint Application of GTE and Bell Atlantic to Transfer Control of GTE's California Utility Subsidiaries to Bell Atlantic, Which Will Occur Indirectly as a Result of GTE's Merger with Bell Atlantic, California Public Utilities Commission A. 98-12-005, on behalf of the California Office of Ratepayer Advocate, filed on June 7, 1999.

In the Matter of the Investigation on the Commission's Own Motion Into All Matters Relating to the Merger of Ameritech Corporation and SBC Communications Inc., Indiana Utility Regulatory Commission Cause No. 41255, on behalf of the Indiana Office of Utility Consumer Counselor, filed on June 22, 1999 and July 12, 1999, cross-examined July 20, 1999.

In re Application of Bell Atlantic Corporation and GTE Corporation for Approval of the GTE Corporation - Bell Atlantic Corporation Merger, Washington Utilities and Transportation Commission UT-981367, on behalf of the Washington Attorney General Public Counsel Section, filed on August 2, 1999.

Application of New York Telephone Company for Alternative Rate Regulation, Connecticut Department of Public Utility Control Docket No. 99-03-06, on behalf of the Connecticut Office of Consumer Counsel, filed October 22, 1999.

In re: Area Code 515 Relief Plan, Iowa Utilities Board Docket No. SPU-99-22, on behalf of Iowa Office of Consumer Advocate, filed November 8, 1999, and December 3, 1999, cross-examined December 14, 1999.

In re Application of MCI WorldCom, Inc. and Central Telephone Company - Nevada, d/b/a Sprint of Nevada, and other Sprint entities for Approval of Transfer of Control pursuant to NRS 704.329, Nevada Public Utilities Commission Application No. 99-12029, on behalf of the Nevada Office of the Attorney General, Bureau of Consumer Protection, filed April 20, 2000.

In re: Area Code 319 Relief Plan, Iowa Utilities Board Docket No. SPU-99-30, on behalf of Iowa Office of Consumer Advocate, filed June 26, 2000 and July 24, 2000.

In re: Sprint Communications Company, L.P. & Level 3 Communications, L.L.C., Iowa Utilities Board Docket Nos. SPU-02-11 & SPU-02-13, on behalf of Iowa Office of Consumer Advocate, filed October 14, 2002 and January 6, 2003, cross-examined February 5, 2003.

Illinois Bell Telephone Company filing to increase unbundled loop and nonrecurring rates (tariffs filed December 24, 2002), Illinois Commerce Commission Docket No. 02-0864, on behalf of Citizens Utility Board, filed May 6, 2003 and February 20, 2004.

Qwest Petition for Competitive Classification of Business Services, Washington Utilities and Transportation Commission Docket No. 030614, on behalf of Public Counsel, filed August 13, 2003 and August 29, 2003, cross-examined September 18, 2003.

In the Matter of the Application of CenturyTel of Northwest Arkansas, LLC for Approval of a General Change in Rates and Tariffs, Arkansas Public Service Commission Docket No. 03-041-U, on behalf of the Attorney General, filed October 9, 2003 and November 20, 2003.

In the Matter of the Board's Review of Unbundled Network Elements, Rates, Terms and Conditions of Bell Atlantic New Jersey, Inc., New Jersey Board of Public Utilities Docket No. TO00060356, on behalf of the New Jersey Division of the Ratepayer Advocate, filed January 23, 2004.

In the Matter of the Implementation of the Federal Communications Commission's Triennial Review Order, New Jersey Board of Public Utilities Docket No. TO03090705, on behalf of the New Jersey Division of the Ratepayer Advocate, filed February 2, 2004.

Unbundled Access to Network Elements, Review of the Section 251 Unbundling Obligations of Local Exchange Carriers, Federal Communications Commission WC Docket No. 04-313, CC Docket No. 01-338, sponsored affidavit on behalf of the New Jersey Division of the Ratepayer Advocate, filed October 4, 2004.

Unbundled Access to Network Elements, Review of the Section 251 Unbundling Obligations of Local Exchange Carriers, Federal Communications Commission WC Docket No. 04-313, CC Docket No. 01-338, sponsored affidavit on behalf of the Utah Committee of Consumer Services, filed October 4, 2004.

In the Matter of Verizon New Jersey, Inc. For a Revision of Tariff B.P.U.-N.J. – No. 2 Providing for a Revenue Neutral Rate Restructure Including a Restructure of Residence and Business Basic Exchange Service and Elimination of \$.65 Credit, New Jersey Board of Public Utilities Docket No. TT04060442, on behalf of the New Jersey Division of the Ratepayer Advocate, filed December 22, 2004 and January 18, 2005.

In the Matter of the Application of Verizon New Jersey, Inc. for Approval (I) of a New Plan for an Alternative Form of Regulation and (II) to Reclassify Multi-Line Rate Regulated Business Services as Competitive Services, and Compliance Filing, New Jersey Board of Public Utilities Docket No. TO01020095, on behalf of the New Jersey Division of the Ratepayer Advocate, filed January 10, 2005 and February 4, 2005.

Joint Petition of SBC Communications Inc. and AT&T Corp., Together with its Certificated Subsidiaries for Approval of Merger, New Jersey Board of Public Utilities Docket No. TM05020168, on behalf of the New Jersey Division of the Ratepayer Advocate, filed May 4, 2005 and June 1, 2005.

In the Matter of Verizon Communications Inc. and MCI, Inc., Applications for Approval of Transfer of Control, Federal Communications Commission WC Docket No. 05-75, co-sponsored affidavit on behalf of the New Jersey Division of the Ratepayer Advocate, filed on May 9, 2005.

In the Matter of the Application of Southwestern Bell Telephone, L.P., d/b/a SBC Arkansas to Set Rates for Unbundled Network Elements, Arkansas Public Service Commission Docket No. 04-109-U, on behalf of the Attorney General, filed May 27, 2005.

Joint Petition of Verizon Communications Inc. and MCI, Inc. for Approval of Merger, New Jersey Board of Public Utilities Docket No. TM05030189, on behalf of the New Jersey Division of the Ratepayer Advocate, filed July 8, 2005 and August 19, 2005.

In the Matter of Joint Petition of United Telephone Company of New Jersey, Inc. d/b/a Sprint and LTD Holding Company for Approval Pursuant to *N.J.S.A. 48:2-51* and *N.J.S.A. 48:3-10* of a change in Ownership and Control, New Jersey Board of Public Utilities Docket No. TM05080739, on behalf of the New Jersey Division of the Ratepayer Advocate, filed November 29, 2005.

In the Matter of the Board's Review of the Classification of Verizon New Jersey's Directory Assistance Services ("DAS") as Competitive and Associated Service Quality, Docket No. TX06010057, In the Matter of the Filing by Verizon New Jersey Inc. for the Reclassification of Existing Rate Regulated Services – Directory Assistance Services as Competitive, New Jersey Board of Public Utilities, Docket No. TT97120889, on behalf of the New Jersey Division of the Ratepayer Advocate, filed May 12, 2006.

In the Matter of AT&T Inc. and BellSouth Corporation Applications for Approval of Transfer of Control, Federal Communications Commission WC Docket No. 06-74, sponsored declaration with Sarah M.

Bosley on behalf of the New Jersey Division of the Ratepayer Advocate, filed June 5, 2006; sponsored declaration with Sarah M. Bosley and Timothy E. Howington on behalf of the New Jersey Division of Rate Counsel, October 3, 2006.

In the Matter of Jurisdictional Separations and Referral to the Federal-State Joint Board, CC Docket No. 80-286, sponsored affidavit on behalf of the National Association of State Utility Consumer Advocates and the New Jersey Division of Rate Counsel, filed August 22, 2006.

In the Matter of the Board Investigation Regarding the Reclassification of Competitive Local Exchange Carrier (CLEC) Services as Competitive, New Jersey Board of Public Utilities Docket No. TX06120841, on behalf of the New Jersey Division of Rate Counsel, filed January 7, 2007, January 30, 2007, and February 20, 2007.

Verizon New England Inc., Bell Atlantic Communications, Inc., NYNEX Long Distance Company, Verizon Select Services Inc. and FairPoint Communications, Inc. Joint Petition for Authority to Transfer Assets and Franchise to FairPoint Communications, Inc., New Hampshire Public Utilities Commission Docket No. DT-07-011, on behalf of the Office of Consumer Advocate, filed August 1, 2007, cross-examined November 1, 2007.

In the Matter of the Commission's Investigation into Verizon Maryland, Inc.'s Affiliate Relationships, Maryland Public Service Commission Case No. 9120, on behalf of the Office of People's Counsel, filed October 29, 2007 and November 19, 2007, cross-examined November 28, 2007.

In the Matter of the Board Investigation Regarding the Reclassification of Incumbent Local Exchange Carrier (ILEC) Services as Competitive, New Jersey Board of Public Utilities Docket No. TX07110873, on behalf of the New Jersey Division of Rate Counsel, filed December 14, 2007, January 10, 2008.

In the Matter of Verizon Washington, DC Inc.'s Price Cap Plan 2007 for the Provision of Local Telecommunications Services in the District of Columbia, Public Service Commission of the District of Columbia Formal Case No. 1057, on behalf of the District of Columbia Office of People's Counsel, filed December 20, 2007, January 31, 2008.

In re Possible Extension of Board Jurisdiction over Single Line Flat-Rated Residential and Business Rates for Local Exchange Carriers, Iowa Utilities Board Docket No. INU-08-1, on behalf of Iowa Office of Consumer Advocate, filed March 17, 2008, April 28, 2008, cross-examined May 22, 2008.

Petition of the Office of Consumer Counsel for Enforcement of Quality of Service Standards for the Southern New England Telephone Company d/b/a AT&T Connecticut, Connecticut Department of Public Utility Control Docket No. 08-07-15, on behalf of the Communications Workers of America, Local 1298, filed January 30, 2009, cross-examined February 25, 2009.

In the Matter of the Board's Investigation and Review of Local Exchange Carrier Intrastate Exchange Access Rates, New Jersey Board of Public Utilities Docket No. TX08090830, on behalf of the New Jersey Division of Rate Counsel, filed February 13, 2009, April 20, 2009, and June 22, 2009, cross-examined October 20, 2009.

In the Matter of Appropriate Forms Of Regulating Telephone Companies, Maryland Public Service Commission, Case No. 9133, on behalf of the Communications Workers of America, filed June 1, 2009, October 16, 2009, October 30, 2009, cross-examined November 4, 2009.

Petition of the Office of Consumer Counsel for Enforcement of Quality of Service Standards for the Southern New England Telephone Company d/b/a AT&T Connecticut, Connecticut Department of Public Utility Control Docket No. 08-07-15PH02, on behalf of the Communications Workers of America, Local 1298, filed September 21, 2009.

In the Matter of the Application of Frontier Communications Corporation, New Communications Holdings, Inc. and Verizon Communications Inc. for Consent and Approval of a Change in Control, Public Utilities Commission of Ohio Case No. 09-454-TP-ACO, on behalf of the Communications Workers of America and International Brotherhood of Electrical Workers, Local 986, filed October 14, 2009.

Frontier Communications Corporation, Verizon Communications, Inc., Verizon North Inc., Verizon South Inc., New Communications of the Carolinas, Inc. Joint Application for the approval of a Reorganization, Illinois Commerce Commission Docket No. 09-0268, on behalf of the International Brotherhood of Electrical Workers, Locals 21, 51, and 702, filed October 20, 2009.

In re Verizon Service Quality in Western Massachusetts, Massachusetts Department of Telecommunications and Cable D.T.C. 09-1, on behalf of the Office of the Attorney General, filed November 9, 2009, February 24, 2010, cross-examined March 31, 2010, April 1, 2010, May 21, 2010.

Joint Application of Frontier Communications Corporation and Verizon West Virginia Inc. and certain affiliates for approval of the transfer of Verizon's local exchange and long distance business in West Virginia to companies to be owned and controlled by Frontier Communications Corporation, Public Service Commission of West Virginia Case No. 09-0871-T-PC, on behalf of the Communications Workers of America, AFL-CIO, filed November 16, 2009.

In the Matter of Qwest Communications Company and CenturyTel, Inc. for Approval of Control of Qwest Communications Company LLC, New Jersey Board of Public Utilities Docket No. TM10050343, on behalf of the New Jersey Division of Rate Counsel, filed September 23, 2010.

Petition of the North American Numbering Plan Administrator on behalf of the Pennsylvania Telecommunications Industry for Approval of Numbering Plan Area Relief Planning for the 814 NPA, Pennsylvania Public Utility Commission Docket No. P-2009-2112925, on behalf of the Pennsylvania Office of Consumer Advocate, filed May 23, 2011, cross-examined May 24, 2011.

In re Applications of AT&T, Inc. and Deutsche Telekom AG for Consent to the Transfer of Control of the Licenses and Authorizations Held by T-Mobile USA, Inc. and its Subsidiaries to AT&T Inc., WT Docket No. 11-65, File Nos. 0004669383, *et al.*, sponsored declarations on behalf of the New Jersey Division of Rate Counsel, May 31, 2011, and June 20, 2011.

In the Matter of Application of Cellco Partnership d/b/a Verizon Wireless and SpectrumCo LLC For Consent To Assign Licenses and Application of Cellco Partnership d/b/a Verizon Wireless and Cox TMI Wireless, LLC For Consent To Assign Licenses, WT Docket No. 12-4, sponsored declarations on behalf of the New Jersey Division of Rate Counsel, filed February 17, 2012, and March 26, 2012.

In the Matter of the Board's Investigation Regarding the Reclassification of Incumbent Local Exchange Carrier (ILEC) Services as Competitive – Phase II, New Jersey Board of Public Utilities Docket No. TX11090570, on behalf of the New Jersey Division of Rate Counsel, filed February 24, 2012, April 27, 2012, and June 11, 2012, cross-examined July 17, 2012.

Petition of David K. Ebersole, Jr. and the Office of Consumer Advocate for a Declaratory Order that Verizon Pennsylvania Inc. Has Not Met Its Legal Obligation to the Greensburg Bona Fide Retail Request Group Pursuant to Its Chapter 30 Plan, Pennsylvania Public Utility Commission Docket No. P-2012-2323362, affidavit on behalf of the Pennsylvania Office of Consumer Advocate, September 6, 2012.

In the Matter of Commission Consideration Of Effective Competition Areas and the Classification of Basic Local Exchange Service, Colorado Public Utilities Commission Proceeding Number 13M-0422T, Pursuant to 4 CCR 723-2-2213, answer testimony on behalf of AARP, December 6, 2013, cross-examined January 7, 2014.

PURA Establishment of Rules for Electric Suppliers and EDCs Concerning Operations and Marketing in the Electric Retail Market, Connecticut Public Utilities Regulatory Authority Docket No. 13-07-18, testimony and supplemental testimony on behalf of the Connecticut Office of Consumer Counsel, initial and supplemental testimony (with Helen E. Golding), March 10, 2014 and March 17, 2014, cross-examined March 27, 2014.

Joint Application of Frontier Communications Corporation and AT&T Inc. for Approval of a Change in Control, Connecticut Public Utilities Regulatory Authority Docket No. 14-01-46, testimony on behalf of the Connecticut Office of Consumer Counsel, May 23, 2014, cross-examined June 30, 2014.

The Utility Reform Network, Complainant vs. Pacific Bell Telephone Company D/B/A AT&T California (U1001C); AT&T Communications of California, Inc. (U5002C), Defendants, California Public Utilities Commission Case No. 13-12-005, Complaint of the Utility Reform Network Regarding Basic Service Rates of AT&T California (Public Utilities Code Section 1702; Commission Rule of Practice and Procedure 4.1(b)), December 6, 2013, initial and rebuttal testimony on behalf of the Utility Reform Network (TURN), August 22, 2014 and October 3, 2014.

Joint Petition of Verizon Pennsylvania LLC and Verizon North LLC for Competitive Classification of all Retail Services in Certain Geographic Areas, and for a Waiver of Regulation for Competitive Services, Pennsylvania PUC Docket Nos. P-2014-2446303 and P-2014-2446304, direct and surrebuttal testimony on behalf of Communications Workers of America and the International Brotherhood of Electrical Workers, November 14, 2014, and December 12, 2014, cross-examined December 16, 2014.

Joint Application of Comcast Corporation, Time Warner Cable Inc., Time Warner Cable Information Services (California), LLC, and Bright House Networks Information Services (California), LLC for Expedited Approval of Indirect Transfer of Control of Time Warner Cable Information Services (California), LLC, (U-68740-C); and The Pro Forma Transfer of Control of Bright House Networks Information Services (California), LLC (U-6955-C) to Comcast Corporation, Pursuant to Public Utilities Code Section 854(A), Application No. 14-04-013 (filed April 11, 2014), initial and reply testimony on behalf of the Utility Reform Network (TURN), December 3, 2014 and December 10, 2014.

In the Matter of the Joint Application of Frontier Communications Corporation, Frontier Communications of America, Inc. (U 5429 C), Verizon California Inc. (U 1002 C), Verizon Long Distance, LLC (U 5732), and Newco West Holdings LLC for Approval of Transfer of Control Over Verizon California Inc. and Related Approval of Transfer of Assets and Certifications (Filed March 18, 2015), Application 15-03-005, reply and supplemental testimony on behalf of the Utility Reform Network (TURN), July 28, 2015 and September 11, 2015.

Order Instituting Investigation to Assess the State of Competition Among Telecommunications Providers in California, and to Consider and Resolve Limited Rehearing of Decision (D.) 08-09-042, California Public Utilities Commission Investigation 15-11-007 (November 5, 2015), testimony on behalf of the Utility Reform Network (TURN), March 15, 2016, June 1, 2016 and July 15, 2016; participated in Expert Panel, July 20, 2016.

Pennsylvania Public Utility Commission Docket No. P-2015-2509336, Petition of Communications Workers of America for a Public, On-the-Record Commission Investigation of the Safety, Adequacy, and Reasonableness of Service Provided by Verizon Pennsylvania, LLC, direct testimony on behalf of Communications Workers of America, September 29, 2016.

Petition of the Maryland Office of People's Counsel for an Investigation into Verizon Maryland's Provision of Basic Local Phone Service Over Copper or Fiber Networks, affidavit on behalf of the Maryland Office of People's Counsel, January 13, 2017.

Iowa Utilities Board Docket No. INU-2016-0001, In re: Deregulation of Local Exchange Service, testimony on behalf of Office of Consumer Advocate, February 17, 2017 and April 21, 2017, cross-examined May 23, 2017.

New York Public Service Commission Case 16-C-0122, Proceeding on Motion of the Commission to Consider the Adequacy of Verizon New York Inc.'s Retail Service Quality Processes and Programs, testimony on behalf of the Communications Workers of America, March 24, 2017.

In the Matter of Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment, WC Docket No. 17-84, Notice of Proposed Rulemaking, Notice of Inquiry, and Request for Comment, FCC Rcd 3266, (rel. Apr. 21, 2017), declaration on behalf of the National Association of State Utility Consumer Advocates, Maine Office of the Public Advocate, Maryland Office of People's Counsel ("OPC"), New Jersey Division of Rate Counsel, Office of the Ohio Consumers' Counsel, Pennsylvania Office of Consumer Advocate and The Utility Reform Network, June 15, 2017.

In the Matter of the Petition of Atlantic City Electric Company for Approval of Amendments to its Tariff to Provide For an Increase in Rates and Charges for Electric Service Pursuant to N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1, and for Other Appropriate Relief (2017), New Jersey Board of Public Utilities Docket No. ER 17030308, testimony on behalf of New Jersey Division of Rate Counsel, August 1, 2017.

Wyoming Public Service Commission Docket No. 700000-1644-TA-17, In the Matter of the Application of Qwest Corporation d/b/a CenturyLink QC for Determination that Basic Residential and Business Services Are Competitive Throughout All of CenturyLink QC's Zone 2 and Zone 3 Service Areas, testimony on behalf of AARP, November 15, 2017, cross-examined December 11, 2018.

Washington Utilities & Transportation Commission Docket UT-171082, CenturyLink's Obligations Under the Commission's Line Extension Rules, testimony on behalf of Public Counsel, June 1, 2018 and July 3, 2018.

In the Matter of the Petition of Public Service Electric and Gas Company for Approval of an Increase in Electric and Gas Rates and for Changes in the Tariffs for Electric and Gas Service, B.P.U.N.J. No. 16 Electric and B.P.U.N.J. No. 16 Gas, and for Changes in Depreciation Rates Pursuant to N.J.S.A. 48:2-18, N.J.S.A. 48:2-21 AND N.J.S.A. 48:2-21.1 and for Other Appropriate Relief, New Jersey Board of Public Utilities Docket Nos. ER18010029 and GR18010030, OAL Docket No. PUC 01151-18, testimony on behalf of New Jersey Division of Rate Counsel, August 6, 2018.

Washington Utilities & Transportation Commission, Docket UT-180831, Rulemaking to Consider Possible Changes to Rules in Chapter 480-120 WAC, Relating to Service Obligations of Telephone Companies, assisted with the preparation of Comments of Public Counsel, December 7, 2018, participated in technical conference on behalf of Public Counsel, January 17, 2019.

In the Matter of the Petition of the Maryland Office of People's Counsel for an Investigation into Verizon Maryland's Provision of Basic Local Phone Service Over Copper or Fiber Networks - ML#210061, Report on behalf of Maryland Office of People's Counsel, February 8, 2019.

Connecticut Public Utilities Regulatory Authority Docket No. 18-06-02, Review of Feasibility, Costs, and Benefits of Placing Certain Customers on Standard Service Pursuant to Conn. Gen. Stat. § 16-245o(m), testimony on behalf of Connecticut Office of Consumer Counsel, February 27, 2019, cross-examined July 18, 2019.

New Mexico Public Regulation Commission Case No. 18-00295-UT, In the Matter of the Petition of CenturyLink CQ Regarding Effective Competition for Retail Residential Services, testimony on behalf of CWA, April 15, 2019, cross-examined September 25-26, 2019.

Testimony before State Legislatures:

Testified on September 24, 1997, before the Massachusetts State Legislature Joint Committee on Government Regulations regarding House Bill 4937 (concerning area codes).

Testified on March 2, 2010, before the Maryland State Legislature Senate Finance Committee regarding Senate Bill 677 (concerning Telephone Landline Sale Bill).

Testified on March 11, 2010, before the Maryland State Legislature House Economic Matters Committee regarding House Bill 937 (concerning Telephone Landline Sale Bill).

Testified on June 25, 2013, on behalf of AARP, before the Ohio Select Committee on Telecommunications Regulatory Reform (regarding SB 162).

Testified on December 12, 2013, on behalf of AARP, before the Pennsylvania House Consumer Affairs Committee (regarding House Bill 1608).

Reports/Publications/Presentations

Expert reports in tax matters, reports and publications on telecommunications and energy policy in trade journals, and presentations at industry associations and conferences include the following:

Expert reports in tax matters:

Iowa Department of Inspections and Appeals, In the Matter of Cable One, Inc. v. Iowa Department of Revenue, DIA 10DORFC014, SBTR Nos. 899 and 903, Property Tax Assessment, Expert Report, January 21, 2011 (on behalf of the Iowa Department of Revenue), deposed February 9, 2011.

Level 3 Communications, LLC. v. Arizona Department of Revenue; Coshise County; Graham County; Greenlee County; La Paz County; Maricopa County; Mohave County; Pima County, Pinal County and Yuma County, Superior Court of the State of Arizona in the Arizona Tax Court, No. TX-2007-000594, Expert Report, May 20, 2011 (on behalf of the Arizona Department of Revenue), deposed July 14, 2011; cross-examined August 24, 2012.

Bresnan Communications, LLC, Plaintiff, v. State of Montana Department of Revenue, Defendant, Cause No. DV-10-1312, July 5, 2011 (on behalf of the Montana Department of Revenue), deposed July 29, 2011.

Verizon California Inc., Plaintiff, v. California Board of Equalization, Defendants, December 18, 2015 (on behalf of the California Board of Equalization), deposed January 20, 2016.

Reports and Publications:

“Are Consumers Benefiting from Competition? An Analysis of the Individual Residential Electric Supply Market in Massachusetts, prepared for Massachusetts Attorney General’s Office, July 2019 Update.

“Residential energy supply market: Unmet promises and needed reforms” (with Frank A. Felder), *The Electricity Journal*, 32 (2019) 31–38.

“Maryland’s Residential Electric and Gas Supply Markets: Where Do We Go from Here?” (with Sarah

M. Bosley), prepared for the Maryland Office of People's Counsel, November 2018.

"Are Consumers Benefiting from Competition? An Analysis of the Individual Residential Electric Supply Market in Massachusetts" (with Sarah M. Bosley), prepared for the Massachusetts Attorney General's Office, March 29, 2018.

"The Cable-Telco Duopoly's Deployment of New Jersey's Information Infrastructure: Establishing Accountability" (with Sarah M. Bosley and Timothy E. Howington). Prepared for the Public Advocate of New Jersey, January 19, 2007.

"Assessing SBC/Pacific's Progress in Eliminating Barriers to Entry: The Local Market in California Is Not Yet 'Fully and Irreversibly Open'" (with Patricia D. Kravtin, Dr. Lee L. Selwyn, and Douglas S. Williams). Prepared for the California Association of Competitive Telecommunications Companies, July 2000.

"Where Have All the Numbers Gone? (Second Edition): Rescuing the North American Numbering Plan from Mismanagement and Premature Exhaust" (with Dr. Lee L. Selwyn). Prepared for the Ad Hoc Telecommunications Users Committee, June 2000.

"Price Cap Plan for USWC: Establishing Appropriate Price and Service Quality Incentives for Utah" (with Patricia D. Kravtin and Scott C. Lundquist). Prepared for the Utah Division of Public Utilities, March 22, 2000.

"Telephone Numbering: Establishing a Policy for the District of Columbia to Promote Economic Development" (with Douglas S. Williams and Sarah C. Bosley). Prepared for the District of Columbia Office of People's Counsel, February 2000 (submitted to Eric W. Price, Deputy Mayor, April 6, 2000).

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Advisor to:

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Exhibit SMB-1

Attachment F to Stipulation approved in *2018 PSE&G Order*

ATTACHMENT F

**CUSTOMER SERVICE
PERFORMANCE
STANDARDS**

ATTACHMENT F
CUSTOMER SERVICE PERFORMANCE STANDARDS

The Company will submit to BPU Staff and the Division of Rate Counsel a quarterly report providing the results of the Company's monthly performance in relation to the following *eight (8) customer service metrics*:

1. Average Speed of Answer (ASA)

Measure: ASA

Benchmark: eighty percent (80%) of telephone calls answered within thirty (30) seconds

Definition: Measured in seconds from the time when a customer indicates the desire to speak to a customer service representative to when the customer service representative picks up the telephone. This measure includes abandoned calls.

2. Abandoned Call Percentage (ACP)

Measure: ACP

Benchmark: five percent (5%) or less of calls abandoned

Definition: The number of telephone calls to the IVR system that are terminated by the customer before reaching the selected destination, whether a department or a customer service representative.

3. Customer Service Representative Response

Measure: CSR response. A companion measure to the ASA

Benchmark: No benchmark established

Definition: Average time in seconds it takes for a customer to reach a customer service representative.

4. Meter Reading

Measure: Percentage of Meters read

Benchmark: Ninety-five percent (95%) of meters read on cycle

Definition: The percentage of meters actually read on cycle.

5. Billing

Measure: *Billing Accuracy*

Benchmark: twenty (20) or fewer rebills per one thousand (1,000) customers

Definition: The number of rebills per one thousand (1,000) customers measured as all bills mailed to customers that are later adjusted, cancelled or re-issued for any amount or reason.

6. Leak/Odor Response Time

Measure: ninety five percent (95%) of telephone calls responded to within sixty (60) minutes

Definition: Leak, odor and emergency call response measured from the initial customer telephone call to the time qualified personnel arrive at the location to either assess or implement a "make safe" condition.

Exception Reporting: Submit a quarterly report to the BPU for all calls that are not responded to within (60) minutes, giving the reasons for the delay.

7. Percentage of Service Appointments Met

Measure: Percentage of Service Appointments met

Benchmark: ninety five percent (95%) of service appointments met

Definition: The percentage of appointments completed on the day scheduled. Includes appointments for meter installations, disconnects and reconnects, billing investigations, initial and final meter reads. Excludes regularly scheduled meter reads, gas leaks, emergencies, outages and appointments missed by the customer.

8. BPU Complaints

Measure: *Customer complaints/contacts to the BPU*

Benchmark: Less than one (1) complaint/contact per one thousand (1,000) customers annually

**DOCUMENTS CITED
IN TESTIMONY**

Company Name: Rockland Electric Company
Case Description: Rockland Electric Company 2019 Rate Case
Case: ER19050552

Response to BPU Interrogatories – Set RCR-CI
Date of Response: August 9, 2019
Responding Witness: Rockland Electric Company

Question No. : 64

Reference attachment to response to RCR-CI-12.

- a. Please confirm that the most recent JD Power results are dated May 2017 (see page 68 of 90). If this is correct, why did the JD Power surveys stop?
- b. Are any JD Power surveys underway on behalf of the Company? If so, when will each be completed and please provide as soon as it is completed.
- c. Does the Company have any plans to have JD Power conduct customer surveys on the Company's behalf in 2019 or 2020?
- d. Refer to page 53 of 90 showing that "awareness of assistance programs" declined from 39% in 2016 to 28% in 2017. Did the Company undertake any specific initiative, programs, or changes in policies and procedures to address the decline in customer awareness of assistance programs? If not, why not? If so, describe them in detail and indicate the dates of such implementation.
- e. See page 79 of 90 (entitled "Multi-Channel Outage Communications"). Separately for each of the items listed, describe the Company's follow-up actions.

RESPONSE: (do not edit or delete this line or anything above this)

- a. The most recent JD Power results are from July 2019. Please see the attachment.
- b. The next survey results are scheduled to be released in October 2019, based on data acquired in July/August 2019.
- c. Please see the Company's response to subpart b above. The Company expects to conduct additional surveys in 2020.
- d. The Company has undertaken several initiatives to address the decline in customer awareness of assistance programs. These include social media, press releases, bill inserts, and IVR outbound phone calls, all of which were implemented throughout 2018. In addition, please see the attached 2018

Rockland Electric Company Marketing Outreach Plan: Energy Assistance Programs.

- e. Planned Work: The Company uses the IVR to notify customers of outages and planned work in specific areas of the service territory. Electric Operations is working closer together with Customer Operations to improve communication regarding planned work.

Storm Notifications: There has been promotion and increased enrollment in texting for outage and restoration communications through ongoing advertising, press releases, welcome letters and social media.

E-mail Communications for Storms: The Company has developed new, more detailed e-mails.

Post Restoration IVR Calls: The Company has been working on redesigning the IVR and post restoration IVR calls have not yet commenced.

Rockland Electric Company Marketing Outreach Plan: Energy Assistance Programs

Company Information

Rockland Electric Company (RECO or the Company) is a subsidiary of Orange and Rockland Utilities, Inc., which is a wholly owned by Consolidated Edison, Inc. RECO provides electric service to approximately 73,000 customers in parts of Sussex, Bergen and Passaic Counties of New Jersey. The townships and communities RECO serves include the following: Allendale, Alpine, Closter, Cresskill, Demarest, Franklin Lakes, Harrington Park, Haworth (Part), Montvale, Northvale, Mahwah, Wyckoff, Ringwood, West Milford, Montague (Part), Vernon (Part), Norwood, Oakland, Old Tappan, Ramsey, Rivervale, Rockleigh, Saddle River, and Upper Saddle River.

RECO has two local Customer Walk-in Business Offices that may handle bill payments, service requests, credit matters and account questions. Offices are open weekdays from 8:00 a.m. to 4:30 p.m., except holidays.

One Lethbridge Plaza Suite 32, Second Floor Route 17 North Mahwah, NJ 07430	This location is not a full service Walk-in Business Office
Spring Valley Operations Center 390 West Route 59 Spring Valley, NY 10977	This location is a full service Walk-in Business Office

Customers may reach a RECO Customer Service Representative toll-free at 1-877-434-4100 from Monday through Friday, 8:00 a.m. to 7:00 p.m., except holidays. Inquiries are also accepted through RECO's website at oru.com/ContactUs.

Staffing and Training

RECO has approximately five utility personnel working on energy assistance matters, which involves administering energy assistance programs, responding to customer inquiries and sending notices, and developing outreach and marketing materials. This includes personnel from Customer Energy Services (2), Customer Service (2), and Corporate Communications (1).

Customer Service Representatives also communicate with customers about energy assistance programs. They participate in monthly and annual training regarding energy assistance programs, including a refresher training prior to the winter heating season and updates on the Company's energy saving programs. In addition, Customer Service Representatives receive a printed copy of the information available on the New Jersey Community Resources information website (<http://www.njcommunityresources.info/njenergy.html>). This information includes New Jersey energy assistance programs and community resources available to customers.

Customer Communications and Information

RECO shares energy assistance information with its New Jersey customers through mail, e-mail, phone calls and recorded messages while waiting on hold for customer service. In addition, RECO posts information at Customer Walk-in Business Offices, and shares information and links on the website (<http://www.oru.com/assistance>).

Notices:

- Every termination notice sent to customers during the winter heating season, includes the Company's NJ Winter Shut-Off Brochure (see Attachment 1).
- Collection field representatives leave a NJ Collection Door Hanger (see Attachment 2) at customer sites that have been terminated or are pending termination. RECO may add language regarding energy assistance programs to this notice.
- Customer Energy Services sends letters regarding Universal Service Fund (USF) and Fresh Start program status to participants (See Attachments 3-9). RECO may send emails to increase communication with Fresh Start participants.
- The Company mails the NJ Customer Rights and Responsibilities to all customers annually (see Attachment 10).

Phone Calls:

- Customer Service Representatives discuss energy assistance programs with any delinquent customers or those in danger of being shut off.
- The Customer Service phone number provides recorded information about NJ SHARES while customers wait to speak to a Customer Service Representative.
- Low Income Home Energy Assistance Program (LIHEAP) eligible customers receive robocalls about additional assistance available, such as Emergency LIHEAP.

Customer Walk-in Business Offices:

- Customer Walk-in Business Office Customer Service Representatives are trained annually and receive a printed copy of the information available on the New Jersey Community Resources information website (<http://www.njcommunityresources.info/njenergy.html>).
- RECO may use posters promoting energy assistance programs to customers visiting the Mahwah or Spring Valley Walk-In Business Offices.

Website:

- RECO recently updated its website to enhance the customer experience. Key enhancements include easier navigation and search features, upgraded account management and mobile applications.
- Information about energy assistance programs for New Jersey are located under the "Payment Plans and Assistance" section (<http://www.oru.com/assistance>). Specifically, RECO provides information about budget billing, bill extender, Home Energy Assistance (HEA), New Jersey Lifeline Credit, NJ SHARES, Payment Assistance for Gas and Electric (PAGE) Program, Payment Extensions, Get Well First, Payment Agreements, and Special Services. Once the

program launches, RECO will share information about its Low Income Audit and Direct Install Program.

Marketing and Outreach Strategy

RECO employs a variety of strategies to promote energy assistance programs and reach low-income customers. Key strategies include participating in community outreach events and conferences, increasing partnerships with Community Based Organizations (CBO) and other local agencies, and promoting energy assistance programs via bill inserts, e-blasts, social media, and other media resources.

Community Outreach Events:

RECO will continue to participate in outreach events in the New Jersey service territory. These include Earth Day events, Hackensack Riverkeepers Challenge, the NJ Weatherization and Home Energy Assistance Training (WHEAT) Conference, and NJ Utility Energy Outreach Group (NJUEOG) Summits. These Summits provide information about energy assistance and energy conservation to social service professionals. RECO participated in both NJUEOG 2018 Summits. The first Summit was held in January in New Brunswick and the second Summit took place in July in Atlantic City. Approximately two hundred participants from social service organizations and CBO attended each Summit. RECO also engages in outreach activities with customers during its annual Suburban Home Show participation.

Partnerships with Community Based Organizations and Local Agencies:

RECO will explore opportunities to work with the Center for Food Action, Senior Centers and the Ramapo Lenape Nation. RECO will provide these organizations with information and posters, including information on the PAGE program. RECO plans to engage with these groups twice each year, *i.e.*, in the winter and summer.

In conjunction with the NJUEOG, RECO will work the NJ Department of Labor (DOL) to promote the low-income energy assistance programs at One Stop locations (workforce development) throughout RECO's service territory. RECO also will promote these programs on the DOL website. The target audience for this promotion is the recently unemployed. Information regarding RECO's low-income energy assistance programs will be provided during unemployment counseling sessions.

The NJUEOG and the Department of Community Affairs (DCA) printed placemats with energy assistance information to be provided to Meals on Wheels recipients. RECO is also exploring possibilities to collaborate with the gas company that serves RECO's electric service territory (*i.e.*, Public Service Electric and Gas Company). RECO also is currently exploring additional collaboration opportunities with the DCA county offices, such as potential outreach through Mayor's offices. Collaboration with municipalities will also be explored, such as a possible link to low income program information on municipalities' websites.

Bill Inserts:

- Prior to the start of heating season, RECO publishes an insert outlining the NJ assistance programs – this is sent to all NJ residential customers (See Attachment 11).
- The fall *@home* customer newsletter includes an article that offers a description and contact information on energy assistance programs (See Attachment 12).

- RECO produces a separate bill insert that includes information regarding USF/HEA, Lifeline, PAGE and NJ SHARES. This bill insert is sent during the months of November through March to customers facing termination for non-payment.

Emails and Social Media:

As an effort to increase awareness, RECO plans to increase its email and social media efforts for energy assistance programs as follows.

- RECO plans to send two emails per year (*i.e.*, one in the winter and one in the summer) to eligible customers regarding the PAGE grant program.
- RECO plans to coordinate its social media messaging (e.g., Facebook and Twitter), with the above email schedule.
- RECO plans to participate with NJUEOG and use social media as an outlet (See Attachment 13).

Weatherization Assistance Program Information:

In addition to providing customers with weatherization program brochures and information regarding measures performed by its implementation contractor, RECO plans to promote the weatherization program in the Mahwah Office and in its main Walk-in Business Office lobby in Spring Valley. All information on assistance programs is available on RECO's website at <http://www.oru.com/assistance>.

Attachments

1. 2017 NJ Winter Shut Off Brochure.pdf
2. NJ Collection Door Hanger Example.pdf
3. USF New Enrollment Letter Example.pdf
4. USF Benefit Expiration Letter Example.pdf
5. Fresh Start Enrollment Letter Example.pdf
6. Fresh Start Clarification Letter Example.pdf
7. Fresh Start Completion Letter Example.pdf
8. Fresh Start Reminder Letter Example.pdf
9. Fresh Start Final Reminder Letter Example.pdf
10. NJ Customer Rights and Responsibilities 2018.pdf
11. NJ At Home Newsletter.pdf
12. NJ Assistance Programs Insert.pdf
13. NJ Twitter-LinkedIn NEAUC Award Post.pdf

Company Name: Rockland Electric Company
Case Description: Rockland Electric Company 2019 Rate Case
Case: ER19050552

Response to BPU Interrogatories – Set RCR-CI
Date of Response: June 27, 2019
Responding Witness: Rockland Electric Company

Question No. : 14

Please identify any and all customer service metrics that the Company tracks in compliance with Board rules and orders.

RESPONSE: (do not edit or delete this line or anything above this)

The NJ Board of Public Utilities has not defined or mandated any specific metrics that the Company must follow.

Company Name: Rockland Electric Company
Case Description: Rockland Electric Company 2019 Rate Case
Case: ER19050552

Response to BPU Interrogatories – Set RCR-CI
Date of Response: August 9, 2019
Responding Witness: Rockland Electric Company

Question No. : 68

Reference response to RCR-CI-14, “The NJ Board of Public Utilities has not defined or mandated any specific metrics that the Company must follow.”

- a. Does the Company have the ability to track customer service metrics separately from New Jersey (as opposed to New York)? If not, identify the steps, costs, and time line for so doing, separately for each of the metrics set forth in part (d) to this question.
- b. Please list each customer service metric reported to the NYPSC by O&R, the standard associated with such metric, and whether the metrics would be reasonable to achieve in New Jersey (and if not, the reasons).
- c. Please list each customer service metric reported by Rockland or any of its affiliates to any regulatory body, identify the regulatory body, and specify the standard associated with the metric.
- d. Please comment on the feasibility of reporting results that are measured on a monthly basis and reported on a quarterly basis to Board Staff and to Rate Counsel on the following aspects of the Company’s customer service and, for each metric, indicate whether the Company could report New Jersey information separately from company-wide information (include the calendar time and the cost associated with implementation):
 - (i) Percent of calls answered within 30 seconds;
 - (ii) Average speed of answer;
 - (iii) Complaint rate per 1,000;
 - (iv) Complaints disaggregated by categories (such as billing, payment arrangements, deposits, credit, collections, meters, financial assistance programs, service disconnection and third-party suppliers);

- (v) Percent of meters read on cycle;
- (vi) Meter accuracy;
- (vii) Participation in financial assistance program (separately by financial assistance programs including for example, Low Income Home Energy Assistance Program (“LIHEAP”), Universal Service Fund (“USF”)) – measured in absolute numbers; and
- (viii) Percent of installation appointments met.

RESPONSE: (do not edit or delete this line or anything above this)

- a) The Company objects to this interrogatory on the grounds that it calls for a special study, and that it seeks information that is irrelevant or not reasonably calculated to lead to the discovery of admissible evidence, is overbroad or otherwise seeks information that exceeds the scope of this proceeding. Subject to and without waiving this objection, the Company does not have the ability to track customer service metrics separately between NY and NJ. The Company tracks customer service metric data on a consolidated basis.
- b) The Company objects to this interrogatory on the grounds that it calls for speculation. Subject to and without waiving this objection, please see the Company’s response to RCR-CI-63.
- c) The Company objects to this interrogatory on the grounds that it seeks information that is irrelevant or not reasonably calculated to lead to the discovery of admissible evidence, is overbroad or otherwise seek information that exceeds the scope of this proceeding. Subject to and without waiving this objection, please see the Company’s response to RCR-CI-63.
- d) The Company objects to this interrogatory on the grounds that it seeks information that is irrelevant or not reasonably calculated to lead to the discovery of admissible evidence, is overbroad or otherwise seeks information that exceeds the scope of this proceeding and calls for a special study. Subject to and without waiving this objection, please see the Company’s response to subpart a above, as well as to RCR-CI-59.

Company Name: Rockland Electric Company
Case Description: Rockland Electric Company 2019 Rate Case
Case: ER19050552

Response to BPU Interrogatories – Set RCR-CI
Date of Response: June 27, 2019
Responding Witness: Rockland Electric Company

Question No. : 15

To the extent different from or in addition to those metrics that the Company tracks in compliance with Board rules and orders, please identify all customer service metrics that the Company tracks and the Company's internal annual targets for 2013 through 2019 for each such metric, if applicable. Please provide supporting Company documents regarding these objectives and standards and explain any acronyms or terms used for such metrics.

RESPONSE: (do not edit or delete this line or anything above this)

Please see the Company's response to RCR-CI-14. The Company does not track any other customer service metrics.

Company Name: Rockland Electric Company
Case Description: Rockland Electric Company 2019 Rate Case
Case: ER19050552

Response to BPU Interrogatories – Set RCR-CI
Date of Response: August 3, 2019
Responding Witness: Accounting Panel

Question No. : 63

Reference Accounting Panel Testimony, Attachment B, page 5, No. 19 (emphasis added) “Customer Service Performance Incentive Mechanism – Target = meet all three NYPSC Customer Service performance metrics *attached.*”

- a. Please provide the referenced attachment.
- b. Please provide a complete copy of the most recent report regarding the Company’s customer service performance provided to the NYPSC. Does the Company provide the report to the NYPSC on a confidential or a public basis? Please explain.
- c. Would it be reasonable for the Board to establish customer service performance metrics and standards identical to the three NYPSC Customer Service performance metrics? If not, why not?
- d. Are there any NYPSC customer service performance metrics that apply to O&R or to any of its affiliates other than the three referenced? If so, describe each metric in detail, and provide the complete most recent report(s) provided to the NYPSC by the Company and any of its affiliates.

RESPONSE: (do not edit or delete this line or anything above this)

- a. Please see the attachment, “Customer Service Performance Mechanism.”
- b. Please see the attachment, “Customer Service Performance Mechanism Report 2019.” This Report is a public document.
- c. No. There is no foundation to impose on RECO customer service performance metrics and standards identical to the three NYPSC Customer Service Performance Metrics. The Customer Service Performance Mechanism is one of many features of the settlement of Orange and Rockland’s last base rate cases (Cases 18-E-0067 & 18-G-0068). It would be wholly inappropriate for the BPU to impose one feature of the settlement on RECO.

- d. Orange and Rockland objects to this interrogatory on the grounds that it seeks information that is irrelevant or not reasonably calculated to lead to the discovery of admissible evidence; and is overbroad, unduly burdensome, or otherwise seeks information that exceeds the scope of this proceeding.

Orange and Rockland Utilities, Inc.
Cases 18-E-0067 & 18-G-0068

Customer Service Performance Incentive Mechanism

The Customer Service Performance Incentive Mechanism (“CSPIM”) described herein will be in effect for the terms of the Rate Plans and thereafter unless and until changed by the Commission.

a) Operation of Mechanism

The CSPIM establishes threshold performance levels for designated aspects of customer service. For all measures, except the Residential Termination metric, the threshold performance levels are detailed on page 5 of this Appendix 15. Failure by the Company to achieve these specified targets will result in a revenue adjustment of up to \$2.25 million annually. For residential terminations, if it achieves specified targets, the Company has an opportunity to earn a positive revenue adjustment of up to \$800,000 annually; failure by the Company to achieve specified targets will result in a negative revenue adjustment of up to \$800,000 annually. The CSPIM will be measured on a calendar year basis. Accordingly, the results of the performance measurements, as measured during calendar years 2019, 2020 and 2021, respectively, will be applied to Rate Years 1, 2 and 3, respectively.

b) Exclusions

Except for the Residential Termination/Uncollectibles metric, for measurement purposes, results from months having abnormal operating conditions will not be considered. Abnormal operating conditions are deemed to occur during any period of emergency, catastrophe, strike, natural disaster, major storm, or other unusual event not in the Company’s control affecting more than 10 percent of the customers in an operating area during any month. A “major storm” will have the same definition as set forth in 16 NYCRR Part 97.

c) Reporting

The Company will prepare an annual report on its performance that will be filed with the Secretary by March 1 following each Rate Year (*e.g.*, the annual report for 2019 shall be due by March 1, 2020). Each report will state: (1) the Company's actual performance for the calendar year on each measure; (2) whether a revenue adjustment is applicable and, if so, the amount of the revenue adjustment; and (3) whether any exclusions should apply, the basis for requesting each exclusion, and adequate support for all requested exclusions.

d) Threshold Standards

The Company's threshold performance will be measured based on the Company's cumulative monthly performance for each Rate Year for the following three activities, except as otherwise noted.

i. Commission Complaints

The annual Complaint Rate will be calculated in the manner approved by the Commission in its Order Approving Complaint Rate Targets issued August 26, 2005.¹ In calculating the annual Complaint Rate, (i) duplicative rate consultant complaints, (ii) high commodity prices complaints, and (iii) complaints relating to natural disasters, major storms, or other unusual events not in the Company's control, will be excluded. During the Rate Plans, the complaint rate not to exceed targets and associated revenue adjustment levels are set forth in Table 1, below.

ii. Customer Satisfaction

The Company contracts with a third-party vendor to conduct a monthly Customer Contact Satisfaction Survey. The vendor surveys customers utilizing a 10-point scale to rank

¹ Case 02-G-1553, *Proceeding on Motion of the Commission as to the Rates, Charges, Rules, and Regulations of Orange and Rockland Utilities, Inc. for Gas Service*, and Case 03-E-0797, *In the Matter of Orange and Rockland Utilities, Inc.'s Proposal for an Extension of an Existing Rate Plan*, filed in Case 96-E-0900, Order Approving Complaint Rate Target (issued August 26, 2005).

customer satisfaction with Company performance based upon a series of questions and one overall customer satisfaction index question:

“Using a scale from 1 to 10 where 1 means you were very dissatisfied and 10 means you were very satisfied, how satisfied were you the way the Orange and Rockland’s Customer Service Representative handled your recent issue/request?”

The Company reports the percentage of customers surveyed that responded with a score of 7 – 10 to the overall customer satisfaction index question.

iii. Call Answer Rate

“Call Answer Rate” is the percentage of calls answered by a Company representative within 30 seconds of the customer’s request to speak to a representative between the hours of 8:00 AM and 4:30 PM Monday through Friday (excluding holidays). The performance rate is the sum of the system-wide number of calls answered by a representative within 30 seconds divided by the sum of the system-wide number of calls where a customer requests to speak with a representative.

iv. Residential Service Terminations/Uncollectibles

In order to provide a positive financial incentive for the Company to identify and implement new steps to reduce residential service terminations as a result of customer non-payment, and uncollectibles from residential accounts, the Company will have the ability during each Rate Year to achieve an overall maximum positive revenue adjustment totaling \$800,000 if it achieves both of the following Lower Targets for the Rate Year. The Company will incur an overall maximum negative revenue adjustment totaling \$800,000 if it exceeds both of the Upper Targets for the Rate Year. Partial positive and negative adjustments are included in the chart below.

Termination/Uncollectibles Incentive		
	Terminations	<u>Uncollectibles</u>
5-yr Average	7,600	\$2.9 million
Lower Target	<= 6,900	<= \$3.1 million
Upper Target	>=8,600	>=\$4.8 million
	Positive Incentive	Negative Incentive
	\$800,000 if both measures are at or below Lower Targets	\$800,000 if both measures are at or exceed Upper Targets
	\$400,000 if one measure is at or below Lower Target and other is at or below the 5-yr. Average	\$400,000 if one measure is at or exceeds the Upper Target

Any positive or negative revenue adjustment earned will be allocated between the Company's electric and gas businesses based on the common cost allocation factor.

**Table 1 - Customer Service Performance
Incentive Mechanism Targets**

Orange and Rockland Customer Service Performance Incentive (CSPI) (Electric and Gas)			
Indicator	CSPI (Electric and Gas)		
	Target	Electric NRA	Gas NRA
Annual PSC Complaint Rate	< 1.0	\$0	\$0
	> = 1.0	\$200,000	\$100,000
	> = 1.1	\$400,000	\$200,000
	> = 1.2	\$600,000	\$300,000
Customer Contact Satisfaction Survey	> 92.6%	\$0	\$0
	< = 92.6%	\$200,000	\$100,000
	< = 91.8%	\$400,000	\$200,000
	< = 91.0%	\$600,000	\$300,000
Call Answer Rate < 30 sec.	> 58.3%	\$0	\$0
	< = 58.3%	\$100,000	\$50,000
	< = 56.0%	\$200,000	\$100,000
	< = 53.7%	\$300,000	\$150,000
Total		\$1,500,000	\$750,000

- **Call Answer Rate <30 sec targets are adjusted for RY2 and RY3 as provided below.**

	RY2			RY3		
Call Answer Rate <30 sec	>59.3%	\$0	\$0	>60.3%	\$0	\$0
	<=59.3%	\$100,000	\$50,000	<=60.3%	\$100,000	\$50,000
	<=57.0%	\$200,000	\$100,000	<=58.0%	\$200,000	\$100,000
	<=54.7%	\$300,000	\$150,000	<=55.7%	\$300,000	\$150,000

Company Name: Rockland Electric Company
Case Description: Rockland Electric Company 2019 Rate Case
Case: ER19050552

Response to BPU Interrogatories – Set RCR-CI
Date of Response: June 27, 2019
Responding Witness: Rockland Electric Company

Question No. : 1

Please provide the location(s) of all customer call centers and customer service centers, and separately by location provide: (a) the number of management employees; (b) the number of non-management employees; (c) the hours of operation; (d) the languages other than English, if any, available for customers; and (e) the services provided.

RESPONSE: (do not edit or delete this line or anything above this)

The Company has two call centers:

- 390 West Route 59, Spring Valley, NY 10977; and
- 508 Route 208, Blooming Grove, NY 10950.

The Company has three customer service centers:

- 390 West Route 59, Spring Valley, NY 10977;
- 508 Route 208, Blooming Grove, NY 10950; and
- 15 Jersey Avenue, Port Jervis, NY 12771.

Spring Valley Location

(a) Management Employees: 10

(b) Non-Management Employees: 30.5

(c) Hours of Operation: Our call center representatives are available for normal business, Monday through Friday, 8:00 am – 7:00 pm. In addition, the customer service center is open Monday through Friday, 8:00 am – 4:30 pm to assist walk-in customers. Company representatives are available 24/7 to receive emergency calls.

(d) Languages: There are call center representatives that speak Spanish and are able to assist with customer inquiries in Spanish. The Company also contracts with a third-party vendor to assist customers that speak the following languages:

- Spanish;
- Korean;
- Mandarin;
- Haitian Creole;
- Yiddish;

- Arabic;
- Cambodian;
- Russian;
- Polish;
- French;
- Hebrew;
- Italian; and
- Ukrainian.

(e) **Services Provided:** The Customer Assistance Department is a group of representatives who are especially trained in regulatory utility functions. The representatives provide guidance and respond to requests and inquiries to assist both internal organizations and customers. The primary objective of the Customer Assistance Department continues to be to answer customer telephone, face-to-face, or written inquiries in a productive, courteous and accurate manner the first-time customers contact us. The department is responsible for effectively managing customer call volume, processing payments, associated “back-office” work, and also assigns resources to meet seasonal and emergency workloads. The Customer Accounting Group resides within Customer Assistance. Its core work includes back-end billing work such as billing discrepancy reviews, cash balancing, and research functions. Additionally, Customer Accounting is responsible for large power billing, street lighting maintenance, refund check and escheatment reporting, eBill reviews, and lost consumption reporting.

Blooming Grove Location

- (a) Management Employees: 2
- (b) Non-Management Employees: 10
- (c) Hours of Operation: same as the Spring Valley Location
- (d) Languages: same as the Spring Valley Location
- (e) Services Provided: same as the Spring Valley Location

Port Jervis Location

- (a) Management Employees: None
- (b) Non-Management Employees: 2
- (c) Hours of Operation: same as the Spring Valley Location
- (d) Languages: If customers at this location requests to speak with a representative in a Spanish, they are connected to a call center representative that speaks Spanish. If the language requested is something other than English or Spanish, the service is the same as offered at the Spring Valley Location.

Home Agents

In addition, the Company has 18 non-management call center representatives that work remotely from their homes. The representatives provide guidance and respond to requests and inquiries to assist both internal organizations and customers. They answer customer telephone and written inquiries, process payments, and perform associated “back-office” work.

Company Name: Rockland Electric Company
Case Description: Rockland Electric Company 2019 Rate Case
Case: ER19050552

Response to BPU Interrogatories – Set RCR-CI
Date of Response: June 27, 2019
Responding Witness: Rockland Electric Company

Question No. : 5

Does the Company outsource (that is, rely on work performed by an outside vendor rather than Company employees) any of its call center or other customer service activities, including but not limited to billing, outreach, or other services? If so, which ones? If so, provide:

- a. The name, address, phone contact, and web site of each entity to which call center activities are outsourced (“contracting entity”);
- b. A description of the work being outsourced and the department or organization within the Company that arranged for this work to be outsourced;
- c. The number of persons working at each contracting entity on tasks associated with the Company.
- d. A copy of the contract with the contracting entity;
- e. Is the Company presently in negotiation regarding any of its contracts with vendors who handled outsourced call center or other customer service activities? If so, please describe the status of such negotiations.
- f. Separately by vendor, indicate the date and reason(s) the Company first engaged the vendor.
- g. Please describe fully the ways in which the Company supervises the work of its vendors and measures the quality of vendors’ work, including but not limited to the financial incentives and penalties, if any, regarding the quality of the service provided by the contracting entity, and indicate separately by vendor and separately for each year 2013 through the present (specify the months included in 2019), any financial incentives given or penalties imposed.
- h. If the Company has conducted any evaluations of the quality of the vendors’ work since January 1, 2013, please provide copies of such evaluations.

- i. Please indicate the individual responsible for negotiating each contract with each outsourced vendor.

RESPONSE: (do not edit or delete this line or anything above this)

- a. Alorica
Headquarters: 5 Park Plaza, Suite 1100, Irvine, California 92614
(866) 256-7422
<https://www.alorica.com/>

Language Line Solutions
Headquarters: 1 Lower Ragsdale Drive, Building 2, Monterey, California 93940
(800) 752-6096
<https://www.language.com/>
- b. The Company's Customer Assistance department has arranged for some work functions to be handled by a vendor. Specifically, the Company has contracted with Alorica to provide customer service representatives to answer customer calls. This assists the Company in managing increased call volume.
The Company also has contracted with Language Line to assist customers that speak languages other than English. They will translate the conversation with the customer so that Company representatives can assist the customer with their inquiries.
- c. Alorica has approximately 13 agents.
Language Line has sufficient resources to handle the call volume.
- d. Please see the attached **confidential contracts**. Please note that these contracts have been entered into by RECO's corporate affiliate Consolidated Edison Company of New York, Inc. ("Con Edison"), on behalf of Orange and Rockland and RECO.
- e. No.
- f. Alorica - 2013
Language Line – 2017
- g. Alorica handles customer inquiries on the same billing system that the Company uses. Company supervisors review the work processed, as well as have the capability to listen to recorded phone calls. In addition, the Company visits the vendor site three times a year to observe the agents and meet with the management team.

Language Line – RECO records its agents' phone calls and when an agent interacts with a vendor interpreter that call is recorded as well and can be reviewed for quality by a Company supervisor.
- h. The Company has conducted no such formal evaluations.
- i. The Company's Director of Customer Assistance is responsible for negotiating such contracts.

Company Name: Rockland Electric Company
Case Description: Rockland Electric Company 2019 Rate Case
Case: ER19050552

Response to BPU Interrogatories – Set RCR-CI
Date of Response: June 27, 2019
Responding Witness: Rockland Electric Company

Question No. : 6

Are any calls handled by a call center located outside of New Jersey? If so, please describe fully. Does the Company have any plans for the upcoming three years to handle any portion of customer calls using a vendor out of state? If so, describe fully and explain the criteria that would be used to make such a decision.

RESPONSE: (do not edit or delete this line or anything above this)

All customer calls are handled by a call center located outside of New Jersey. Rockland Electric Company (“RECO”) is a subsidiary of Orange and Rockland Utilities, Inc. (“O&R”) which is headquartered in Rockland County, New York. RECO has no operating employees. O&R’s representatives, call centers, and customer service centers serve RECO’s customers. O&R and RECO have no current plans to modify this arrangement.

Company Name: Rockland Electric Company
Case Description: Rockland Electric Company 2019 Rate Case
Case: ER19050552

Response to BPU Interrogatories – Set RCR-CI
Date of Response: August 9, 2019
Responding Witness: Rockland Electric Company

Question No. : 59

Reference response to RCR-CI-3.

- a. Explain the high call abandonment rate during the time period spanning January 2018 through April 2019, including, among other things, the reason for the prolonged period of time during which the abandonment rate was high.
- b. Explain the long average speed of answer (“ASA”) during the time period spanning January 2018 through April 2019, including, among other things, the reason for the prolonged period of time during which the ASA was high.
- c. Explain the steps, if any, that the Company implemented to reduce the abandonment rate.
- d. Explain the steps, if any, that the Company implemented to reduce the ASA.
- e. Did the Company or any entity on behalf of the Company monitor call answer times and abandonment rates during the time period January 2018 through April 2019? If not, why not? If so, identify the person by name and title.
- f. Provide any and all analyses, meeting presentations, memoranda, or other documents prepared by or on behalf of the Company regarding call answer time and abandonment rates during the time period January 2018 through the present.
- g. What abandonment rate could the Company feasibly achieve on a going-forward basis? Please explain.
- h. What ASA could the Company feasibly achieve on a going-forward basis? Please explain.

- i. The Company states that it “does not track the percentage of calls answered within 30, 60, or 90 seconds.” Does the Company possess the capability to track the percentage of calls answered within 30, 60, or 90 seconds? If not, identify the steps, time frame, and costs associated with developing such capability.
- j. To the extent not answered in response to other questions, please identify the specific steps, the calendar time required to implement such steps, and the cost of such steps to be able to “track the percentage of calls within 30 seconds” separately for New Jersey calls and on a combined New Jersey/New York basis.
- k. To the extent not answered in response to other questions, please identify any reasons that it would not be feasible for the Company to track monthly the percent of calls answered within 30 seconds and to report the monthly results on a quarterly basis to Board Staff and Rate Counsel.
- l. Define the term “customer service factor.”

RESPONSE: (do not edit or delete this line or anything above this)

- a) For the period of January 2018 through April 2019 the call abandonment rate was due to a much higher than normal call volume attributable to the following:
 - The Company’s implementation of the Advanced Metering Infrastructure (“AMI”) Program;
 - Solar Billing Inquiries;
 - Scams;
 - High Bill inquiries;
 - Adverse Weather; and
 - Website Upgrades that Required Assistance.
- b) The higher call volume, due to the reasons set forth in the Company’s response to subpart a) above, resulted in the higher ASA.
- c) In order to reduce the abandonment rate, the Company has hired additional Customer Service Representatives (“CSRs”). The Company hired five full-time CSRs in 2018. Through July 2019, the Company hired an additional six full-time CSRs and 15 part-time CSRs. Please note that some of the newly hired CSRs offset employees who either transferred out of the department or left the Company. As of December 31, 2018, the Company had 41 full-time CSRs and two part-time CSRs. As of July 31, 2019, the Company had 46 full-time CSRs and 14 part-time CSRs.

In addition, the Company increased the third-party support personnel available to answer telephone calls. During the period September through December 2018, the Company also extended the hours of operation for the Call Center on Monday to Friday from 8:00 AM – 7:00 PM, to 8:00 AM to 9:00 PM. The Company also opened the Call Center on Saturdays from 8:00 AM – 4:30 PM. The Customer Assistance department also worked closely with other departments (*e.g.*, Customer Support) within the Company to assist in resolving account issues. This allowed CSRs to answer customer calls.

- d) Please see the Company's response to subpart c) above.
- e) Yes, the Company monitors call answer times and abandonment rates. The persons responsible for this are James Udasco – Sr. Specialist IVR Support and Theresa Manera-Mason – Manager Customer Assistance.
- f) Please see the attached confidential Call Center Recovery Plan.
- g) Assuming normal operating conditions and normal staffing levels, the Company could feasibly achieve a $\leq 8\%$ abandonment rate going forward.
- h) Assuming normal operating conditions and normal staffing levels, the Company could feasibly achieve a ≤ 75 second ASA going forward.
- i) Yes.
- j) The Company objects to this interrogatory on the grounds that it would require a special study. Subject to and without waiving this objection, the Company's telephone system does not differentiate between O&R's NY service territory and RECO's NJ service territory. The telephone system does not have the capability to identify calls from specific areas. Calls that come to the Call Center are treated the same on a consolidated basis. The Company currently does not have the capability to track and report separately on NJ incoming calls.
- k) Please see the Company's response to subpart j) above.
- l) Customer Service Factor ("CSF") is the percentage of calls that are answered by a CSR in less than 30 seconds. These calls do not include use of the Interactive Voice Response Unit ("IVR").



July 26, 2019

I/M/O The Petition Of Public Service Electric And Gas Company
For Approval Of An Increase In Electric and Gas Rates And For
Changes In The Tariffs For Electric And Gas Service, B.P.U.N.J. No. 14
Electric And B.P.U.N.J. No. 14 Gas Pursuant to N.J.S.A. 48:2-21 And
N.J.S.A. 48:2-21.1 And For Approval Of a Gas Weather Normalization
Clause; A Pension Expense Tracker And For Other Appropriate Relief
BPU Docket No. GR09050422
OAL Docket No. PUCRL-07599-2009N

VIA ELECTRONIC & REGULAR MAIL

Aida Camacho-Welch, Secretary
Board of Public Utilities
44 South Clinton Avenue, 3rd Fl., Suite 314
P.O. Box 350
Trenton, New Jersey, 08625-0350

Re: Customer Service Metrics Quarterly Report – 2nd Quarter 2019

Dear Secretary Camacho-Welch,

On June 7, 2010, the Board of Public Utilities issued its Final Order in the above-referenced proceeding pursuant to which it approved a Settlement whereby an increase in electric distribution rates was approved.

Enclosed are an original and ten copies of Public Service's Customer Metrics Quarterly Report for 2nd Quarter 2019 pursuant to paragraph 10 of the Board-approved Stipulation of Settlement.

In addition to the report itself, please find an explanation of the five categories utilized to explain leak response times over 60 minutes.

Very truly yours,

A handwritten signature in blue ink that reads "Matthew Weissman".

Matthew M. Weissman

C: E-mail Only:
Eric Hartsfield
Ami Morita, Esq.
Felicia Thomas-Friel, Esq.

Explanation of Reason Categories for GE Response over 60 Minutes

Category 1 – Workload

This explanation is provided when the number of reported gas emergencies at a given time exceeds the capacity of available resources to respond, investigate, and secure the scene of each reported location within the prescribed time frame (60 minutes or less). These examples are most commonly associated with higher than reasonably forecasted gas emergencies in a certain period of time, reports of gas emergencies taken after normal working hours or on weekends or during unusual events where the existence of outside area odors create simultaneous reports of multiple gas emergencies.

Category 2 – Travel

This explanation is provided when first responders report their arrival was delayed by unexpected or unusual travel conditions. Examples would include severe traffic, poor weather conditions (rain, flooding, snow, and ice), detours, vehicle breakdown or collision.

Category 3 – Unable to Locate

This explanation is provided when first responders report they cannot immediately locate the address of the emergency provided by the customer, a passerby, or local emergency services (Police, Fire, OEM). Examples include reports provided with the wrong house number, street name and municipality; or premises that display a different address than the one displayed in the GIS database used by PSE&G.

Category 4 – Work Management

This explanation is provided when the gas emergency work management process breaks down due to failure of PSE&G associates to correctly perform their defined role. These associates include inquiry representatives who may fail to generate accurate gas emergency orders, dispatchers who may fail to assign and follow-up gas emergency orders in a timely fashion, first responders who may fail to proceed immediately to the scene of the reported emergency, and any other situation where human error has delayed the arrival of the first responder beyond 60 minutes. Included in this category are failures of PSE&G associates to follow prescribed processes during planned or emergency system outages.

Category 5 - IT System Issues

This explanation is provided when unexpected or unanticipated failure of the automatic work management system to create, assign, transmit, and / or receive the gas emergency order on the MDT (mobile display terminal) delays the arrival of the first responder beyond 60 minutes. Examples would include new system bugs, failed servers, and / or mobile communications. This category does not include failure of PSE&G associates to follow documented back up procedures in the event of known or anticipated system outages or failures.

Leaks Over 60 Minutes Detail Report

District	Order #	Address	City	Date	Time Taken (notification time)	Time Arrived (ARR)	Response Time (Min.)	Reason for Overage
Orange	400041890245	18TRINITY PL	MONTCLAIR	4/6/2019	11:10:42	12:56:13	106 MIN	4
Audubon	400041928802	435 STATE ST.	CHERRY HILL	4/11/2019	21:08:00	22:11:00	63 MIN	1
New Brunswick	400041952023	545BECCA WAY	MONROE	4/15/2019	15:57:30	17:04:24	67 MIN	2
Jersey City	400042215832	5408HUDSON AVE	WEST NEW YORK	5/19/2019	14:49:01	15:56:17	67 MIN	2
Audubon	400042439045	312 COMLY AVE	COLLINGSWOOD BORO	6/20/2019	4:57:02	6:01:02	64 Min	2

Legend

- 1 Workload - Disproportionate level of gas emergencies received within one hour (odor in air, multiple gas leaks, off hour staffing)
- 2 Travel -Travel time from previous address (traffic, weather, etc.) Vehicle Breakdown / Accident
- 3 Technician Unable to locate Address
- 4 Work Mgn't - (Dispatch process issues, system outage issues, Call Center error)
- 5 True System Issues -System does not perform as designed.

ACE Customer Courtesy Center Statistics

	Offered	Ans	Aban	% Aban	Ans 30	Svc Lev	ASA
January	795	793	2	0.25%	784	98.62%	3
February	676	670	6	0.89%	654	96.75%	4
March	898	891	7	0.78%	868	96.66%	5
April							
May							
June							
July							
August							
September							
October							
November							
December							
2019	2369	2354	15	0.63%	2306	97.34%	4

Company Name: Rockland Electric Company
Case Description: Rockland Electric Company 2019 Rate Case
Case: ER19050552

Response to BPU Interrogatories – Set RCR-CI
Date of Response: June 27, 2019
Responding Witness: Rockland Electric Company

Question No. : 3

Please provide the following in machine-readable Excel format: separately *by month* for the time period spanning January 1, 2013 through the present, and please update throughout this proceeding (if data are unavailable on a monthly basis, please provide the data for the period of time closest to a month for which data are available).

- a. Percentage of calls answered within 30 seconds.
- b. Percentage of calls answered within 60 seconds.
- c. Percentage of calls answered within 90 seconds.
- d. Average answer time.
- e. Abandoned call rate (please define).

RESPONSE: (do not edit or delete this line or anything above this)

The Company does not track the percentage of calls answered within 30, 60, or 90 seconds. Set forth below is the data on average answer time and abandoned call rate from 2014 through May 2019.

“ASA” is “Average Speed to Answer.” “CSF” is “Customer Service Factor.”

Agent Only Stats					
2014					
Month	CALLS OFFERED	CALLS HANDLED	% ABANDON	ASA (in Seconds)	CSF
Jan-14	42343	40117	6.6%	82	59.9%
Feb-14	37115	35722	9.7%	54	69.6%
Mar-14	43359	40852	5.2%	95	54.4%
Apr-14	43756	42095	3.6%	60	63.6%
May-14	38097	37222	2.1%	36	73.9%
Jun-14	37782	36521	3.1%	51	68.6%
Jul-14	40822	38095	6.3%	106	51.2%
Aug-14	37920	35478	6.1%	103	54.8%

Sep-14	39340	37710	3.9%	65	61.1%
Oct-14	39785	37838	4.7%	79	57.1%
Nov-14	33261	30777	7.1%	106	52.9%
Dec-14	38367	35254	7.4%	129	52.4%
YTD 2014	471947	447681	5.5%	81	60.0%

2015					
Month	CALLS OFFERED	CALLS HANDLED	% ABANDON	ASA (in Seconds)	CSF
Jan-15	36082	33377	12.8%	116	54.5%
Feb-15	34275	32744	4.4%	82	60.6%
Mar-15	40789	39793	3.5%	57	63.9%
Apr-15	38153	37055	2.8%	49	65.5%
May-15	33315	32083	3.6%	59	61.4%
Jun-15	38889	37050	4.6%	67	58.8%
Jul-15	36450	34978	3.9%	58	63.7%
Aug-15	35243	33327	5.3%	85	55.8%
Sep-15	35944	33962	5.5%	77	58.4%
Oct-15	36127	34204	5.2%	71	59.5%
Nov-15	30969	29119	5.5%	95	54.2%
Dec-15	33727	31994	5.2%	84	53.9%
YTD 2015	429963	409686	5.2%	75	59.2%

2016					
Month	CALLS OFFERED	CALLS HANDLED	% ABANDON	ASA (in Seconds)	CSF
Jan-16	31657	30218	4.0%	70	65.1%
Feb-16	33045	31857	3.7%	58	68.5%
Mar-16	34020	32701	3.9%	58	65.7%
Apr-16	29190	28069	3.8%	58	64.4%
May-16	30897	29234	5.2%	76	60.5%
Jun-16	32696	30868	5.6%	85	55.4%
Jul-16	31457	29101	7.4%	101	52.8%
Aug-16	36391	34215	5.9%	87	60.8%
Sep-16	35988	32926	8.1%	117	55.4%
Oct-16	34993	32576	6.5%	44	49.5%
Nov-16	31131	28825	6.6%	50	62.0%
Dec-16	33034	30822	6.5%	56	61.8%
YTD 2016	394499	371412	5.6%	72	60.2%

2017					
Month	CALLS OFFERED	CALLS HANDLED	% ABANDON	ASA (in Seconds)	CSF

Jan-17	35742	32580	8.6%	135	53.4%
Feb-17	34297	31671	7.1%	95	63.7%
Mar-17	38270	34106	10.1%	104	59.1%
Apr-17	31876	28134	10.6%	109	59.5%
May-17	35543	33191	6.4%	88	65.5%
Jun-17	34936	31886	8.6%	99	56.6%
Jul-17	34298	31126	9.0%	110	55.9%
Aug-17	38739	35783	7.5%	90	61.7%
Sep-17	35206	31517	9.8%	96	58.1%
Oct-17	39091	35378	9.1%	80	61.6%
Nov-17	34755	31179	10.0%	114	55.1%
Dec-17	33048	29909	9.4%	102	59.0%
YTD 2017	425801	386460	8.9%	102	59.1%

2018					
Month	CALLS OFFERED	CALLS HANDLED	% ABANDON	ASA (in Seconds)	CSF
Jan-18	40356	33941	15.3%	230	41.9%
Feb-18	39147	29187	24.9%	446	27.5%
Mar-18	38451	29756	19.5%	404	43.7%
Apr-18	37281	29817	19.4%	462	18.1%
May-18	40560	28638	26.5%	690	27.7%
Jun-18	42364	24967	40.8%	1007	20.0%
Jul-18	48642	24123	50.3%	1596	20.2%
Aug-18	56632	30392	45.6%	3205	9.4%
Sep-18	48064	27373	42.3%	6145	4.5%
Oct-18	55349	28331	48.7%	6787	6.4%
Nov-18	43189	22728	46.3%	1658	15.3%
Dec-18	40680	24073	39.4%	1266	16.1%
YTD 2018	530715	333326	34.9%	1991	20.9%

2019					
Month	CALLS OFFERED	CALLS HANDLED	% ABANDON	ASA (in Seconds)	CSF
Jan-19	40707	31054	24.8%	392	29.1%
Feb-19	35756	28720	18.6%	238	42.2%
Mar-19	39239	32535	16.1%	193	45.0%
Apr-19	42494	32663	35.2%	267	40.1%
May-19	37446	25528	8.3%	38	80.9%
6/18/2019 (MTD)	20618	19849	3.5%	33	84.0%
YTD 2019	216260	170349	17.8%	194	53.6%

Company Name: Rockland Electric Company
Case Description: Rockland Electric Company 2019 Rate Case
Case: ER19050552

Response to BPU Interrogatories – Set RCR-CI
Date of Response: June 27, 2019
Responding Witness: Rockland Electric Company

Question No. : 19

Please provide the following in machine-readable Excel format: separately by month for the time period spanning January 1, 2013 through the present, and please update throughout this proceeding (if data are unavailable on a monthly basis, please provide the data for the period of time closest to a month for which data are available):

- a. Total meters in operation.
- b. Percentage of meters read each cycle.
- c. Customer reported reads.
- d. Number of complaints that relate to meter reading.
- e. Number of complaints that relate to billing.
- f. Number of re-bills per 1,000 customers.

RESPONSE: (do not edit or delete this line or anything above this)

a. 2018: 72,199; 2019: 72,786 [The Company does not have information for 2014 – 2017]

b.

Year	Scheduled Reads	Reads	Customer Reads	Percentages of Meters Read on Cycle	Notes/Comments
2019	49,200	34,166	35	70%	Up to May 2019
2018	736,544	638,019	165	87%	Jan - Dec 2018

- c. See the Company’s response to subpart b, above.
- d. The Company is unable to respond to this request.
- e. The Company only has information for 2017 through 2019:

Year	Complaints
2017	61

2018	176
2019	78

- f. This information is not readily available and would require a special study.

Company Name: Rockland Electric Company
Case Description: Rockland Electric Company 2019 Rate Case
Case: ER19050552

Response to BPU Interrogatories – Set RCR-CI
Date of Response: August 2, 2019
Responding Witness: Keith Scerbo

Question No. : 69

Reference response to RCR-CI-19. Please explain the reason(s) for the decline in the percentage of meters read from 87% in 2018 to 70% for the time period spanning January through May 2019. Is the Company undertaking any corrective action? If not, why not? If so, please describe in detail and include any documents prepared by or on behalf of the Company relating to efforts to improve meter reading.

RESPONSE: (do not edit or delete this line or anything above this)

The period of January through May 2019 is only reflective of the first five months of the year, and more than half of that time is within the winter period. Winter weather plays a significant role in how many meters are read on cycle. RECO expects that the remaining months of 2019 will level out the impact of winter weather on the overall read on cycle percentage. In addition, RECO was seven months into the AMI Meter deployment when 2019 began. This deployment effort caused meter reading routes, that still required manual meter reading, to take longer to complete because there were longer distances between meters, *i.e.*, it was less efficient to read the remaining meters manually. However, since the AMI meter deployment is now complete this should no longer be an issue.

Company Name: Rockland Electric Company
Case Description: Rockland Electric Company 2019 Rate Case
Case: ER19050552

Response to BPU Interrogatories – Set RCR-CI
Date of Response: August 9, 2019
Responding Witness: Rockland Electric Company

Question No. : 70

Reference response to RCR-CI-21, which states: “The Company tracks consolidated appointment met information for the combined Orange and Rockland and RECO service territories.”

- a. Please identify the steps, time line, and cost of tracking appointment met information separately for the Rockland service territory.
- b. RCR-CI-21 asks: “Please provide a detailed description of how the Company defines and measures the metric “percentage of service appointments met.” Please respond as it relates to measuring consolidated appointment met information.
- c. Please reference also response to RCR-CI-22, which states “The Company does not maintain the data requested by this interrogatory.” Reference also the statement that the Company tracks consolidated appointment met information provided in response to RCR-CI-21. Please provide the consolidated information for as much of the time period spanning January 1, 2013 through the present as the Company has available.
- d. Reference Accounting Panel Testimony, Attachment B, page 4. Separately for each of the years 2013 through 2018 indicate whether the Company has met the target shown and described under metric No. 14 (“Customer Service Appointments Met”). If the Company did not meet the target shown (greater than or equal to 95%) during 2018, identify and describe the steps necessary to meet the 95% target, including the calendar time and costs required.

RESPONSE: (do not edit or delete this line or anything above this)

- a. The Customer Support Operations-Sr. Specialist (“Sr. Specialist”) gathers the various data elements used to develop O&R’s monthly Performance Indicator Report (“PIR”), and files the PIR with the New York Public Service Commission

(“NYSPSC”) by the 15th of each month. No later than the 10th of each month, Customer Meter Operations, Gas Operations and Electric Overhead individually report on their appointments kept performance to the Sr. Specialist. The Sr. Specialist enters this data onto an Excel Spreadsheet that compiles and tracks the monthly and year to date totals of appointments made and kept. The cost of tracking appointments kept would be minimal for RECO to implement, so long as the BPU establishes the job types that would be tracked. RECO would note that it does not provide gas service and that currently O&R’s gas appointments accounts account for approximately 85% of its appointment volume.

- b. Please see the attached NYSPSC Customer Service Metrics Manual (pp. 24-26) which defines the criteria, and formula surrounding appointments made, kept, and missed.
- c. Please see the attached Excel spreadsheet for consolidated appointments kept information from 2015 – 2019.
- d. As set forth in the Excel spreadsheet provided in response to subpart c above, the Company met this target.

Company Name: Rockland Electric Company
Case Description: Rockland Electric Company 2019 Rate Case
Case: ER19050552

Response to BPU Interrogatories – Set RCR-CI-INF
Date of Response: September 17, 2019
Responding Witness: Rockland Electric Company

Question No. : 3

Regarding the Excel spreadsheet RECO produced in response to RCR-CI-70, please explain the changes in line items 1A and 1C between 2018 and 2019.

RESPONSE: (do not edit or delete this line or anything above this)

The increase in appointment volumes began in October 2017 as a result of the New York Public Service Commission’s Order Adopting Revisions to Customer Service Reporting Metrics, issued August 4, 2017 in Case 15-M-0566, *In the Matter of Revisions to Customer Service Performance Indicators Applicable to Gas and Electric Corporations*. - “Order Adopting Revisions to Customer Service Reporting Metrics” Issued and Effective August 4, 2017 (“August 2017 Order”). A link to this Order is set forth below: <http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={ACAF9077-E635-4819-9837-223691B1F6EC}>

The August 2017 Order directed O&R to begin reporting performance on the customer service measures listed in the Appendix of the Order, as soon as practicable, but no later than the first report due after 90 days from the date of the Order (*i.e.*, October 2017). Specifically, the Appointments Kept section of the Appendix (pg. 25) requires that O&R begin tracking appointments associated with “Disconnect/Reconnect for Customer Premise Work” and “Regular Service Turn on/Turn off”, which O&R did not track/report on prior to October 2017.

In reviewing the Excel spreadsheet that RECO produced in response to RCR-CI-70, RECO determined that the 2018 Appointments Made and Appointments Kept numbers were inadvertently misstated. The attachment to this response, “Appointment Kept 2013-2019 (Revised 9.16.19),” contains the correct 2018 Appointments Made and Appointments Kept numbers.

The numbers contained in attachment to this response, “Appointment Kept 2013-2019 (Revised 9.16.19),” contain Appointments Made and Appointments Kept data relating to O&R’s electric and gas operations. The attachment, “Appointment Kept 2013-2019 Excluding Gas Appts,” excludes Appointments Made and Appointments Kept data relating to O&R’s gas operations.

Company Name: Rockland Electric Company
Case Description: Rockland Electric Company 2019 Rate Case
Case: ER19050552

Response to BPU Interrogatories – Set RCR-CI
Date of Response: June 27, 2019
Responding Witness: Rockland Electric Company

Question No. : 25

Please provide, in electronic Excel format, detailed information about customer complaints submitted to Board Staff and, if available, please provide separately for residential customers:

- a. Separately by year for the time period spanning 2013 through the present (specify the months included for 2019) including: (i) total numbers of complaints, and (ii) total complaints disaggregated by the following categories (if other categories apply, please include those categories and describe them): billing, payment arrangements, deposits, credit, collections, service disconnection and third-party suppliers. If the data provided correspond with fiscal rather than calendar years, please so indicate.
- b. For the most recent 12-month period for which data are available, please provide in electronic Excel format a disaggregation of customer complaints by municipality and, in the response, include a separate column showing the total number of customers that the Company serves in each municipality.
- c. Please explain the differences, if any, in the way that the Company handles complaints from residential, commercial and industrial customers.

RESPONSE: (do not edit or delete this line or anything above this)

- a. Please see the attachment.
- b. Please see the attachment.
- c. RECO handles all complaints pursuant to the complaint handling procedure attached to the Company's response to RCR-CI-26.

RECO Complaint Summary June 1, 2018 - June 1, 2019

Municipality	Total Cases
Allendale	1
Alpine	2
Closter	3
Cresskill	1
Demarest	1
Franklin Lakes	7
Haworth	1
Hewitt	4
Mahwah	14
Montague	1
Montvale	1
Northvale	5
Norwood	2
Oakland	6
Old Tappan	2
Ramsey	6
Ringwood	3
Saddle River	1
Upper Saddle River	8
West Milford	5
Wyckoff	7
GRAND TOTAL	81

Municipality	Customers Served
Allendale	2,713
Alpine	773
Closter	3,494
Cresskill	3,234
Demarest	1,754
Franklin Lakes	4,293
Haworth	435
Hewitt	9,703
Mahwah	11,238
Montague	263
Montvale	3,464
Northvale	2,095
Norwood	2,368
Oakland	5,016
Old Tappan	1,639
Ramsey	6,658
Ringwood	3,586
Saddle River	1,001
Upper Saddle River	3,052
West Milford	9,703
Wyckoff	3,695
TOTAL Customers Served	80,177

Complaint/Inquiry/Letter Type	Total
AMI	14
Billing	33
Credit	17
Claim	3
LSE	1
Service	13
GRAND TOTAL	81

2013 - 2019

Complaint Summary

RECO	RCR-C1-25
2013	
Complaint Total	45
Credit	25
Billing	12
Service	8
	<hr/>
	45
2014	
Complaint Total	34
Credit	19
Billing	7
Service	7
Claim	1
	<hr/>
	34
2015	
Complaint Total	52
Credit	19
Billing	17
Service	15
Claim	1
	<hr/>
	52
2016	
Complaint Total	29
Credit	13
Billing	5
Service	10
Claim	1
	<hr/>
	29
2017	
Complaint Total	20
Credit	8
Billing	7
Service	5
	<hr/>
	20
2018	
Complaint Total	98
Credit	16
Billing	32
Service	38
Claim	3
AMI	9
	<hr/>
	98

Company Name: Rockland Electric Company
Case Description: Rockland Electric Company 2019 Rate Case
Case: ER19050552

Response to BPU Interrogatories – Set RCR-CI
Date of Response: June 27, 2019
Responding Witness: Rockland Electric Company

Question No. : 31

Separately for each of the years 2013 through the present, provide the number of residential disconnections for non-payment. Please disaggregate by whether the customers were identified as elderly, disabled, or participating in LIHEAP, USF and/or other payment assistance programs.

RESPONSE: (do not edit or delete this line or anything above this)

The chart below sets forth the number of residential disconnections for non-payment, as well as those involving the elderly, blind and disabled.

	Locks	
	total	EBD
2019	356	4
2018	84	3
2017	238	7
2016	665	25
2015	791	27
2014	773	NA
2013	1075	NA

Company Name: Rockland Electric Company
Case Description: Rockland Electric Company 2019 Rate Case
Case: ER19050552

Response to BPU Interrogatories – Set RCR-CI
Date of Response: August 14, 2019
Responding Witness: Rockland Electric Company

Question No. : 76

Reference response to RCR-CI-31.

- a. Is the Company able to identify separately those disconnections relating to customers receiving USF? If so, please do so. If not, what is the calendar time, steps, and cost of being able to do so?
- b. To what does the Company attribute the increase in disconnections from 84 in 2018 to 356 in 2019?
- c. Does the Company notify municipalities or offer municipalities the option to be notified of pending customer disconnections?
- d. Does the Company notify agencies that serve low-income residents or offer such agencies the option to be notified of pending disconnections?
- e. What steps is the Company taking, if any, to minimize customer disconnections?
- f. Reference also response to RCR-CI-32, which states that Maggie Mooney, Manager of Credit and Collections, is the person “with the primary responsibility for developing and implementing the Company’s efforts to minimize service disconnections for non-payment.” Do Ms. Mooney’s responsibilities encompass efforts to increase participation in financial assistance programs such as USF? If not, please identify by name and title the person responsible.
- g. Regarding the four customers who are elderly, blind, or disabled who were disconnected for non-payment during 2019, please describe fully the communication between the Company and the customer prior to such disconnection, including but not limited to whether those customers were offered deferred payment arrangements, informed about assistance programs, etc.

- h. Please describe generally the Company’s policy, procedures, and processes for disconnecting customers, including those who are elderly, blind or disabled.

RESPONSE: (do not edit or delete this line or anything above this)

- a. Yes. Please see the table below.

USF Locks	
2019	68
2018	12
2017	35
2016	73
2015	96
2014	108
2013	118

- b. The increase is due to the Company’s increased focus on NJ accounts in arrears.
 c. In accordance with New Jersey Administrative Code Section 14:3-3A-7, the Company provides municipalities the option to be notified of those customers whose service was involuntarily disconnected the preceding day.
 d. The Company makes an additional courtesy call to any low-income customer who states that they have a hardship. During this call, the Company provides information on assistance agencies.
 e. The Company sends the customers their bills which are due upon receipt. The Company then provides a termination notice once the bill goes past due. The customer will also receive a reminder phone call, the option for a payment agreement and a field investigation if the Company is unable to reach them on the phone.
 f. No. Charmaine Cigliano- Section Manager, Customer Energy Service.
 g. Please see below.

Account 1: Customer did not return any of the phone calls or respond to notices we sent.

Field Eligible Call: Jan 24
Field Eligible Call: Feb 6
Termination Notice Update: Feb 19
Field Eligible Call: Feb 20
Field Eligible Call: March 5
Termination Notice Update: March 18
Field Eligible Call: April 11
Termination Notice Update: April 22

Locked for Non-Payment: April 24

Account 2: Customer did not return any of the phone calls or respond to notices we sent.

Field Eligible Call: Jan 10
Termination Notice Update: Jan 14
Field Eligible Call: Jan 24
Field Eligible Call: Feb 6
Termination Notice Update: Feb 19
Field Eligible Call: Feb 20
Field Eligible Call: March 5
Referred to DSS: March 11
Termination Notice Update: March 18
Field Eligible Call: April 11
Termination Notice Update: April 22
Locked for Non-Payment: April 24

Account 3: Customer did not return any of the phone calls or respond to notices we sent.

Field Eligible Call: Jan 14
Termination Notice Update: Jan 22
Field Eligible Call: Jan 28
Field Eligible Call: Feb 8
Field Eligible Call: Feb 22
Termination Notice Update: Feb 25
Field Eligible Call: March 7
DSS referral: March 13
Termination Notice Update: March 25
Field Eligible Call: April 15
Termination Notice Update: April 23
Locked for Non-Payment: April 24

Account 4 – Customer did not return any of the phone calls or respond to termination notices.

Field Eligible Call: Jan 8
Field Eligible Call: Jan 22
Termination Notice Update: Jan 25
Field Eligible Call: Feb 4
Field Eligible Call: Feb 15
Termination Notice Update: Feb 25
Field Eligible Call: March 1
DSS Referral: March 2
Termination Notice Update: March 25
Field Eligible Call: April 12
Termination Notice Update: April 23
Eligible Field Call: April 25
Locked for Non-Payment: April 29

- h. Please see the following three attached documents:
- NJ Residential Summer Timeline;
 - NJ Residential Winter Timeline; and
 - NJ Winter-Shut Off brochure distributed in English and Spanish.

There are no special provisions for EBD customers set forth in the New Jersey statutes or regulations. O&R codes customers as EBD based on the New York criteria set forth in the New York Public Service Commission’s regulations (*i.e.*, 16 NYCRR § 11.5 b). EBD customers in New Jersey receive summer and winter regulatory phone calls.

Company Name: Rockland Electric Company
Case Description: Rockland Electric Company 2019 Rate Case
Case: ER19050552

Response to BPU Interrogatories – Set RCR-CI
Date of Response: June 27, 2019
Responding Witness: Rockland Electric Company

Question No. : 33

Please provide in machine-readable Excel format customer enrollment numbers for payment assistance programs, separately by program:

- a. For the entire Company service territory, by year, for each year beginning 2013 through 2018, and projected for 2019.
- b. By municipality for 2018.

RESPONSE: (do not edit or delete this line or anything above this)

Please see the attachment RCR-CI-33.

Year	USF customers
2013	718
2014	649
2015	691
2016	627
2017	616
2018	578
19-May	568 Projection for 2019 based on May 2019 actual USF customers

Company Name: Rockland Electric Company
Case Description: Rockland Electric Company 2019 Rate Case
Case: ER19050552

Response to BPU Interrogatories – Set RCR-CI
Date of Response: August 9, 2019
Responding Witness: Rockland Electric Company

Question No. : 75

Reference response to RCR-CI-30, which shows USF customers by year between 2013 to May 2019. See also response to RCR-CI-33. The number steadily declined (except in 2015) from 2013 (from 718) to May 2019 (568).

- a. What steps, if any, is the Company taking to increase USF participation?
- b. To what factors does the Company attribute the decline?
- c. Please refer also to the attachment to the response to RCR-CI-50, specifically the bill insert entitled “Need help paying your energy bill?” which describes other assistance programs (such as LIHEAP, Lifeline, PAGE and SHARE).
 - (i) Please explain why the Company did not provide participation numbers for these programs in response to RCR-CI-30.
 - (ii) Please explain in detail what would be entailed with the Company tracking participation numbers for each of the programs.
 - (iii) Please provide participation numbers for 2013 through the present for LIHEAP, Lifeline, PAGE and SHARE).

RESPONSE: (do not edit or delete this line or anything above this)

- a. The Company is beginning to ramp up its Low-Income Direct Install III program. As part of the program outreach strategy, the Company plans to engage with the communities served within the service territory through outreach events including Community Based Organizations and other local agencies, to promote USF assistance.
- b. The Company attributes a portion of the decline to customer participation in the Low-Income Direct Install Program I and II, which have served approximately 80% of the Company’s USF customers.

- c. (i) The Company interpreted RCR-CI-30 as applying to only customers receiving USF payments.
- (ii) The Company does track these numbers. In preparing the exhibit provided in response to subpart c (iii) below, the Company needed to gather manually this information from various customer databases. To provide this information prospectively, the Company would need to automate this process. The Company has not analyzed what would be required to automate this process, or the cost of such automation.
- (iii) Please see attached Exhibit.

RCR-CI 75
Exhibit 1
Payment Assistance Programs
Number of Payments Issued

<u>Program</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>
NJLifeline	675	617	551	596	593	520	180
LIHEAP	N/A	166	129	248	198	254	195
NJShares	4	0	2	5	7	1	4
PAGE	N/A	5	5	2	4	12	5
TRUE	6	8	1	1	8	Program Closed	

N/A Data Not Available

Company Name: Rockland Electric Company
Case Description: Rockland Electric Company 2019 Rate Case
Case: ER19050552

Response to BPU Interrogatories – Set RCR-CI
Date of Response: August 9, 2019
Responding Witness: Rockland Electric Company

Question No. : 64

Reference attachment to response to RCR-CI-12.

- a. Please confirm that the most recent JD Power results are dated May 2017 (see page 68 of 90). If this is correct, why did the JD Power surveys stop?
- b. Are any JD Power surveys underway on behalf of the Company? If so, when will each be completed and please provide as soon as it is completed.
- c. Does the Company have any plans to have JD Power conduct customer surveys on the Company's behalf in 2019 or 2020?
- d. Refer to page 53 of 90 showing that "awareness of assistance programs" declined from 39% in 2016 to 28% in 2017. Did the Company undertake any specific initiative, programs, or changes in policies and procedures to address the decline in customer awareness of assistance programs? If not, why not? If so, describe them in detail and indicate the dates of such implementation.
- e. See page 79 of 90 (entitled "Multi-Channel Outage Communications"). Separately for each of the items listed, describe the Company's follow-up actions.

RESPONSE: (do not edit or delete this line or anything above this)

- a. The most recent JD Power results are from July 2019. Please see the attachment.
- b. The next survey results are scheduled to be released in October 2019, based on data acquired in July/August 2019.
- c. Please see the Company's response to subpart b above. The Company expects to conduct additional surveys in 2020.
- d. The Company has undertaken several initiatives to address the decline in customer awareness of assistance programs. These include social media, press releases, bill inserts, and IVR outbound phone calls, all of which were implemented throughout 2018. In addition, please see the attached 2018

Rockland Electric Company Marketing Outreach Plan: Energy Assistance Programs.

- e. Planned Work: The Company uses the IVR to notify customers of outages and planned work in specific areas of the service territory. Electric Operations is working closer together with Customer Operations to improve communication regarding planned work.

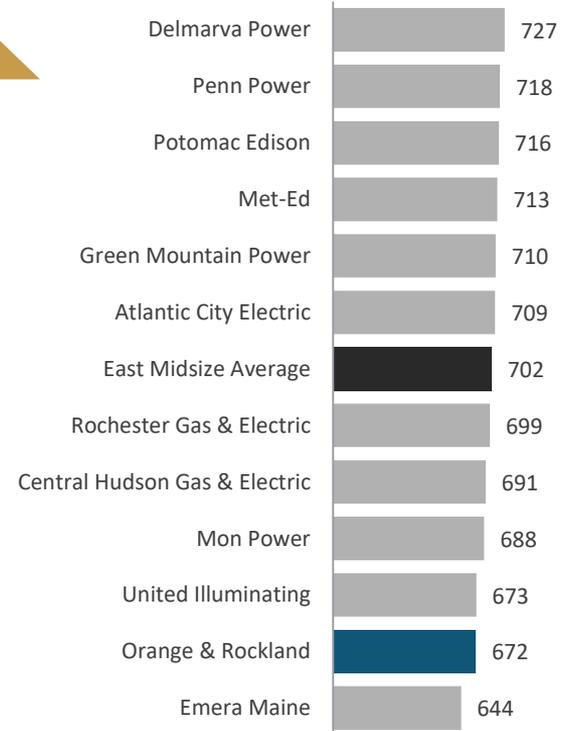
Storm Notifications: There has been promotion and increased enrollment in texting for outage and restoration communications through ongoing advertising, press releases, welcome letters and social media.

E-mail Communications for Storms: The Company has developed new, more detailed e-mails.

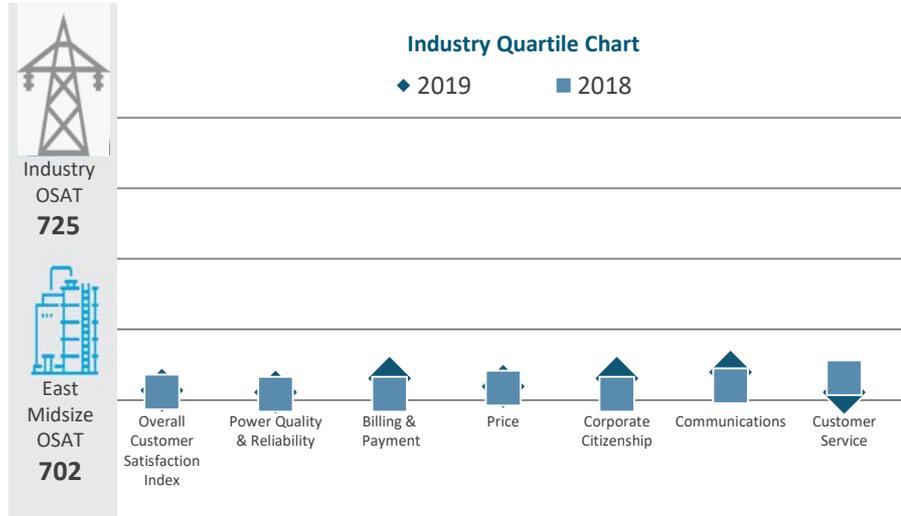
Post Restoration IVR Calls: The Company has been working on redesigning the IVR and post restoration IVR calls have not yet commenced.



**Overall Satisfaction Ranking
East Midsize**

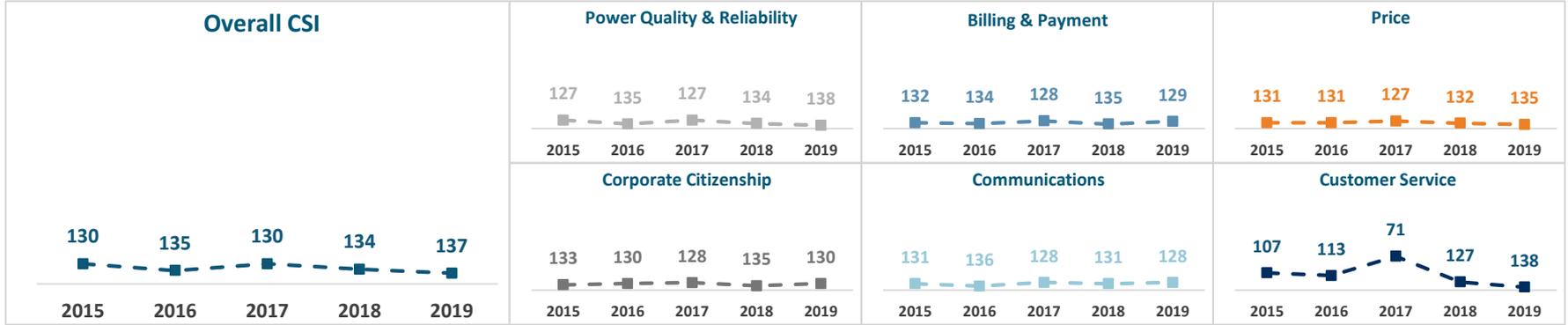


Industry Quartile Chart
◆ 2019 ■ 2018

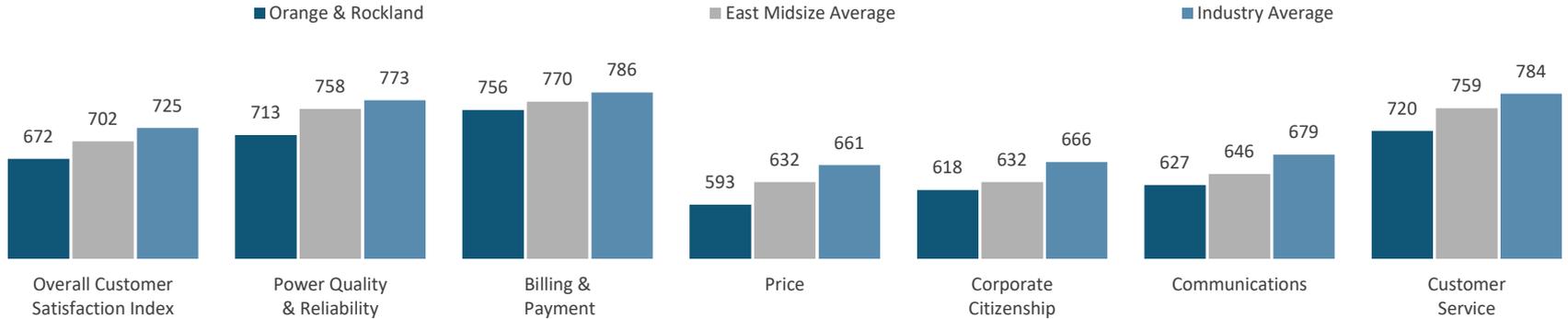


Note: Differences are based off 2019 versus 2018.

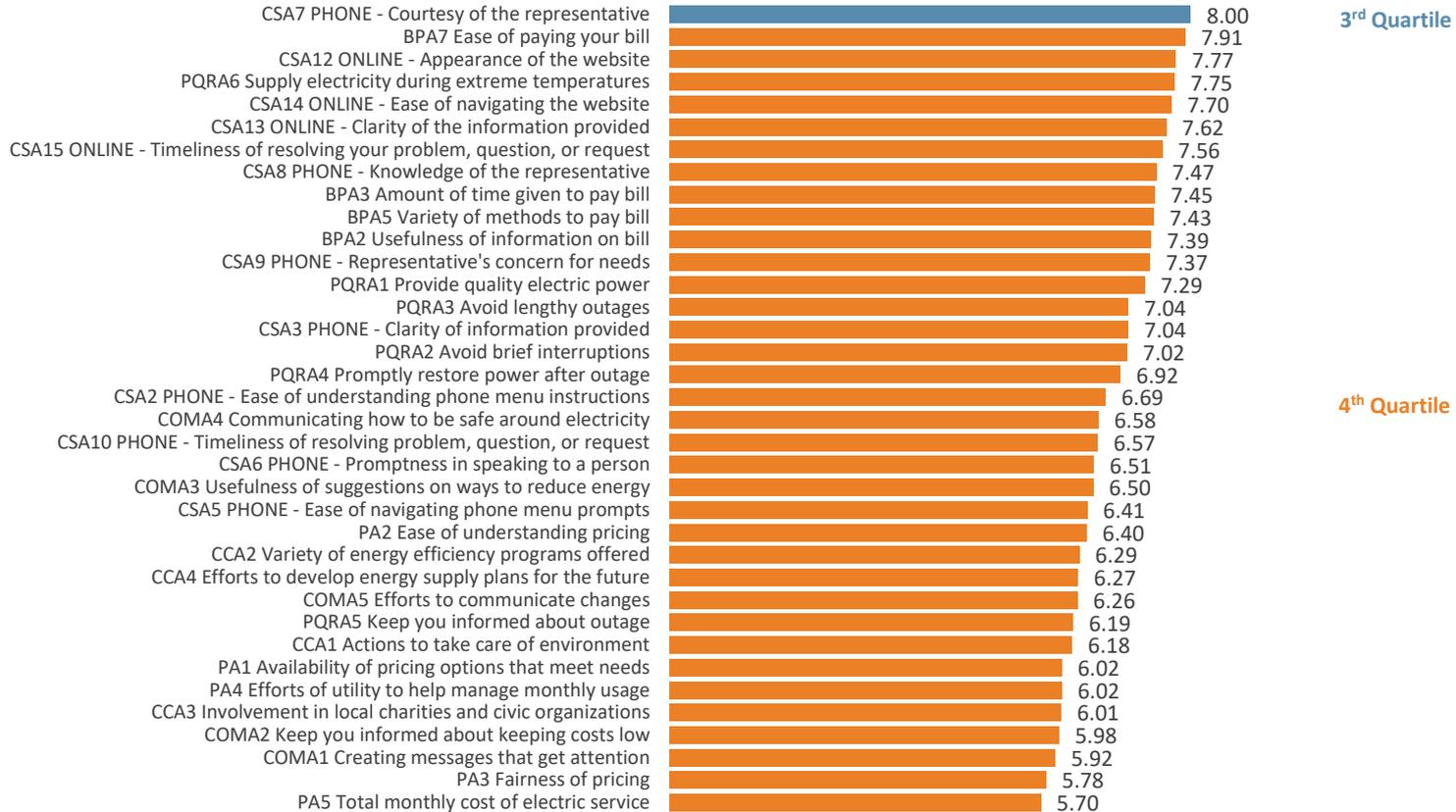
National Factor Rank



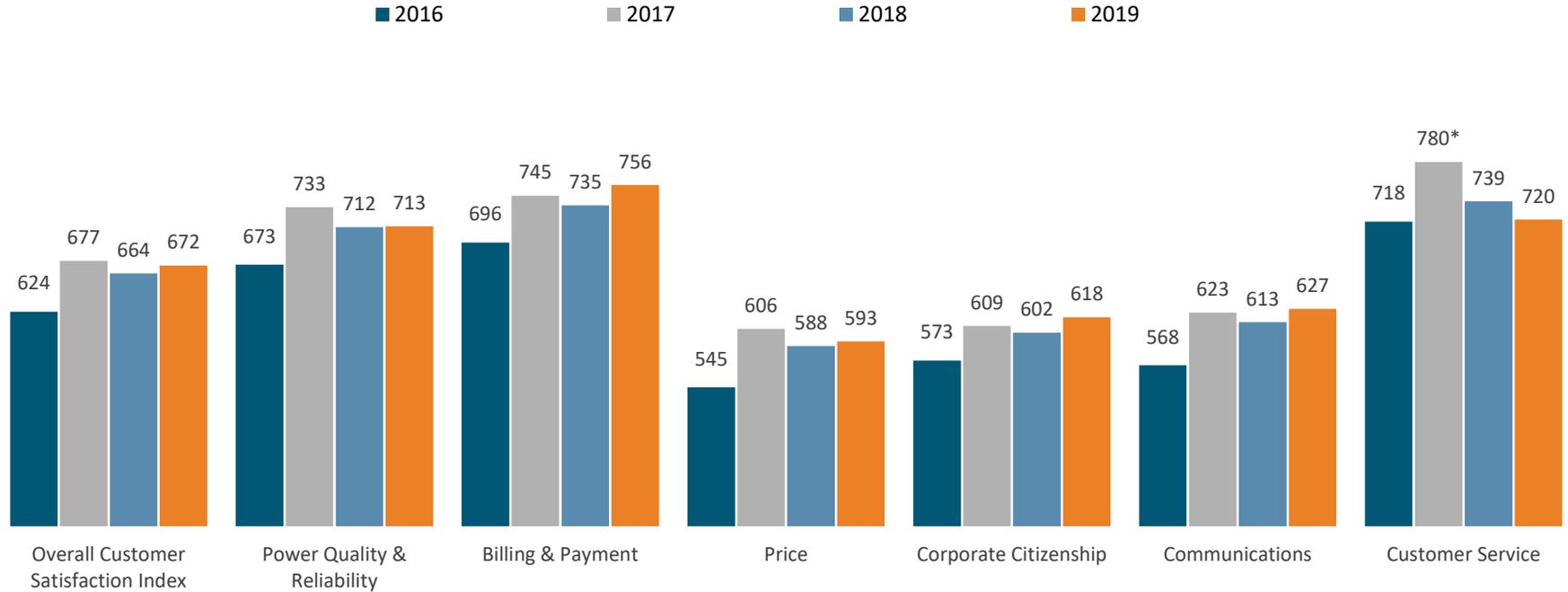
2019 Factor Scores



Attributes by Quartile – Orange & Rockland vs. National Average



Overall CSI and Factor Performance – Trailing Four Years



Note: *Small sample size (n=30-99).

Company Name: Rockland Electric Company
Case Description: Rockland Electric Company 2019 Rate Case
Case: ER19050552

Response to BPU Interrogatories – Set RCR-CI
Date of Response: August 9, 2019
Responding Witness: Rockland Electric Company

Question No. : 77

Reference response to RCR-CI-36.a, which refers to the “‘FINAL 2018 RECO Energy Assistance Outreach Plan’ for a description of the Company’s education and community outreach efforts regarding payment assistance programs” (referred to in this question as the “Plan”).

- a. Please provide the name and title of the author(s) of the Plan.
- b. Does the Company plan to prepare a 2019 Plan? If so, please provide a copy when it is available.
- c. How frequently does the Company prepare an Energy Assistance Outreach Plan?
- d. Reference the attachment to the response to RCR-CI-36.a., which states, among other things, that the walk-in business center that is located in NJ (Mahwah) “is not a full service Walk-in Business Office.” Reference also response to RCR-CUS-1. Was the Mahwah center ever a full service walk-in center? If so, why was the full service discontinued. What would it take for Mahwah to be a full service walk-in business office similar to the New York State customer service centers identified in response to RCR-CUS-1 (Spring Valley, Blooming Grove, and Port Jervis)? Include the steps required, the calendar time associated with the implementation of the steps, and the costs of each step to establish Mahwah as a full service walk-in business office similar to those offered by O&R in New York State.
- e. See page 2 of the Plan, which refers to LIHEAP eligible customers. Does Rockland have the capability to track how many of its customers receive LIHEAP assistance? If not, what would it take?
- f. See page 3 of the Plan, which refers to the Company’s plan of “increasing partnerships with Community Based Organizations (CBO) and other local agencies.” Please identify all partnerships with CBOs and local agencies that existed in 2018, those that exist now, and those planned for 2019-2020.

- g. See page 4 of the Plan, which lists 13 attachments. Please provide the 13 attachments.

RESPONSE: (do not edit or delete this line or anything above this)

- a) Charmaine Cigliano, Section Manager – Customer Energy Services
- b) No. The Company plans to execute the 2018 Plan before developing an updated plan.
- c) The Company has historically developed an Energy Assistance Outreach Plan which is submitted to the BPU when the Company requests an extension of the Low-Income Direct Install Program.
- d) The Mahwah center was never a full-service walk-in center. A complete renovation of the space is required to accommodate a customer accessible walk-in center and the reconfiguration of the work space for Company personnel that work in that space. The Company performed a preliminary evaluation and determined that it would cost approximately \$100,000 to renovate the Mahwah center (including the installation of bulletproof glass). The Company concluded that this cost was excessive. The Company has performed no further analysis.

Past analysis has shown that it would not be cost effective to offer full services at this location. The number of payments that are processed at the kiosk in the Mahwah center each month do not justify having full time walk-in center staff stationed there. The Spring Valley walk-in center is less than ten miles from the Mahwah center. If a customer needs to speak with a Customer Service Representative in person, it would not be a hardship to go to the Spring Valley Office.

Furthermore, the Company's Public Affairs Department conducted a survey with 98 RECO customers in June 2018. Results found that 93% of the customers surveyed have never visited a walk-in customer service location and do not plan on using a walk-in center in Mahwah, NJ. Those who had visited before have not done so in the past year. The survey also found that the majority of surveyed customers are enrolled in e-Bill and do not support the establishment of a Mahwah walk-in center.

- e) Yes
- f) The Company has not yet begun to engage CBOs and other local agencies. The Company experienced some delays with executing the Low-Income Direct Install III program contract with its vendor, Honeywell. In addition, the administrator of the Low-Income Outreach Program left the Company for a new position. The Company currently expects to begin implementation of the Outreach and Education plan once the position vacancy of Specialist (Low Income and Demand Management Programs) is filled. The Company expects to fill this position within the next 60 days.
- g) Please see Exhibit 1 to this response.

Company Name: Rockland Electric Company
Case Description: Rockland Electric Company 2019 Rate Case
Case: ER19050552

Response to BPU Interrogatories – Set RCR-CI-INF
Date of Response: September 17, 2019
Responding Witness: Rockland Electric Company

Question No. : 2

Regarding RECO's responses to RCR-CI-30 and 75, please discuss the reasons for the decrease in USF participation.

RESPONSE: (do not edit or delete this line or anything above this)

The decrease in USF participation by RECO's customers from 2013 – 2019, as noted in RCR-CI – 30, corresponds to customers participation in RECO's Low Income Direct Install programs I and II. The Low Income Direct Install program provides participants with a free energy audit and educational materials, health and safety testing, free installation of electric efficiency measures and installation of gas efficiency measures provided by the overlapping gas utility. Such participation results in decreased electricity usage by participating customers, with a corresponding decrease in their electric utility bills. RECO first implemented the Low Income Direct Install program in 2010. From 2010 - 2016, the program served 80%, or 520 of the 650 USF participants. RECO's belief is that customers participation in these programs reduced the number of customers who would participate in the USF Program. In addition, the improvement of the economy also may help to account for this reduction.

RECO recently implemented the Low Income Direct Install III Program, which will continue to serve USF participants and work with Community Based Organizations, Weather Assistance Program Agencies, Food Banks and other Local Agencies, to assist low-income customers that may not have applied or qualified for USF assistance.

Company Name: Rockland Electric Company
Case Description: Rockland Electric Company 2019 Rate Case
Case: ER19050552

Response to BPU Interrogatories – Set RCR-CI
Date of Response: June 27, 2019
Responding Witness: Rockland Electric Company

Question No. : 42

Please provide the following information regarding deferred payment arrangements (“DPAs”) in machine-readable Excel format on a monthly basis and on an annual total basis separately for each of the years: 2013 through 2019 year-to-date (specify months included for 2019).

- a. Newly established DPAs;
- b. Average down payment (in dollars) of DPAs;
- c. Average term (in months) of DPAs;
- d. Average dollar amount of arrears made subject to a DPA;
- e. Average monthly installment of DPAs;
- f. Number of defaulted DPAs;
- g. Number of completed (or “successful”) DPAs;
- h. DPA success rate (explain how it is computed);
- i. DPA failure rate (explain how it is computed);
- j. Post-Bankruptcy DPAs;
- k. Average amount written off for each defaulted DPA; and
- l. The total amount written off by the Company for defaulted DPAs.

RESPONSE: (do not edit or delete this line or anything above this)

- a. Please see attachment DPAs.xlsx
- b. The average down payment in the past year (not tracked any further back) has been \$207.00.
- c. The terms of a DPA depend on the circumstances of individual customers and can vary greatly. Currently the overall average term is approximately 31 months.

- d. The average arrears on an account when a customer enters into a DPA has been approximately \$1,052.00.
- e. The average monthly installment over the past year has been approximately \$73.00.
- f. Please see attachment DPAs.xlsx
- g. Please see attachment DPAs.xlsx
- h. The numbers provided for “successful” are DPAs completed on system and an associate success rate is not tracked or reported regularly.
- i. The Company does not track this information. The numbers provided for “defaulted” would not be considered “failure” DPAs automatically. New terms could have been negotiated or an agreement could be restored after defaulted. The Company does not track or report this information.
- j. The Company does not track this information because new post-bankruptcy accounts are treated as regular customers.
- k. The Company does not track this information.
- l. The Company does not track this information.

RCR-CL-1. Please provide the following information regarding deferred payment arrangements ("DPAs") in machine-readable Excel format on a monthly basis and on an annual total basis separately for each of the years: 2013 through 2019 year-to-date (specify months included for 2019).

<p>a. Newly established DPAs:</p> <table border="1"> <tr><td>2013</td><td>1102</td></tr> <tr><td>2014</td><td>988</td></tr> <tr><td>2015</td><td>1003</td></tr> <tr><td>2016</td><td>930</td></tr> <tr><td>2017</td><td>929</td></tr> <tr><td>2018</td><td>995</td></tr> <tr><td>2019 Jan-May</td><td>615</td></tr> </table>	2013	1102	2014	988	2015	1003	2016	930	2017	929	2018	995	2019 Jan-May	615	<p>b. Average down payment (in dollars) of DPAs</p> <table border="1"> <tr><td>2013</td><td></td></tr> <tr><td>2014</td><td></td></tr> <tr><td>2015</td><td></td></tr> <tr><td>2016</td><td></td></tr> <tr><td>2017</td><td></td></tr> <tr><td>2018</td><td></td></tr> <tr><td>2019 Jan-May</td><td></td></tr> </table> <p>See below for answer</p>	2013		2014		2015		2016		2017		2018		2019 Jan-May		<p>c. Average term (in months) of DPAs</p> <table border="1"> <tr><td>2013</td><td></td></tr> <tr><td>2014</td><td></td></tr> <tr><td>2015</td><td></td></tr> <tr><td>2016</td><td></td></tr> <tr><td>2017</td><td></td></tr> <tr><td>2018</td><td></td></tr> <tr><td>2019 Jan-May</td><td></td></tr> </table> <p>See below for answer</p>	2013		2014		2015		2016		2017		2018		2019 Jan-May		<p>d. Average dollar amount of arrears made subject to a DPA</p> <table border="1"> <tr><td>2013</td><td></td></tr> <tr><td>2014</td><td></td></tr> <tr><td>2015</td><td></td></tr> <tr><td>2016</td><td></td></tr> <tr><td>2017</td><td></td></tr> <tr><td>2018</td><td></td></tr> <tr><td>2019 Jan-May</td><td></td></tr> </table> <p>See below for answer</p>	2013		2014		2015		2016		2017		2018		2019 Jan-May		<p>e. Average monthly installment of DPAs</p> <table border="1"> <tr><td>2013</td><td></td></tr> <tr><td>2014</td><td></td></tr> <tr><td>2015</td><td></td></tr> <tr><td>2016</td><td></td></tr> <tr><td>2017</td><td></td></tr> <tr><td>2018</td><td></td></tr> <tr><td>2019 Jan-May</td><td></td></tr> </table> <p>See below for answer</p>	2013		2014		2015		2016		2017		2018		2019 Jan-May		<p>f. Number of defaulted DPAs</p> <table border="1"> <tr><td>2013</td><td>1259</td></tr> <tr><td>2014</td><td>1096</td></tr> <tr><td>2015</td><td>1060</td></tr> <tr><td>2016</td><td>1131</td></tr> <tr><td>2017</td><td>1104</td></tr> <tr><td>2018</td><td>1044</td></tr> <tr><td>2019 Jan-May</td><td>647</td></tr> </table>	2013	1259	2014	1096	2015	1060	2016	1131	2017	1104	2018	1044	2019 Jan-May	647
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New	Jan	Feb	Mar	Apr	May	June	Jul	Aug	Sep	Oct	Nov	Dec	Total	
2013		85	118	91	89	78	78	57	108	133	98	103	64	1,102
2014		60	74	79	87	94	64	82	93	96	103	86	70	988
2015		50	57	98	98	108	69	60	95	86	105	86	91	1,003
2016		52	79	72	74	63	74	41	79	121	115	104	56	930
2017		73	62	68	93	77	51	53	108	94	92	76	82	929
2018		59	50	67	74	55	74	65	87	88	128	153	95	995
2019		86	86	214	102	127								615

Defaulted	Jan	Feb	Mar	Apr	May	June	Jul	Aug	Sep	Oct	Nov	Dec	Total	
2013		85	84	115	130	111	121	112	108	117	93	78	105	1,259
2014		98	111	81	101	86	97	97	19	115	106	76	109	1,096
2015		80	103	65	99	86	116	73	97	91	79	78	93	1,060
2016		130	88	82	92	75	125	92	84	77	96	108	82	1,131
2017		102	94	71	92	95	103	95	96	93	90	96	77	1,104
2018		105	82	74	55	75	87	83	68	88	116	84	127	1,044
2019		124	98	108	182	135								647

Completed	Jan	Feb	Mar	Apr	May	June	Jul	Aug	Sep	Oct	Nov	Dec	Total	
2013		25	20	25	23	21	25	25	25	21	17	27	13	267
2014		262	32	34	26	24	25	18	93	21	20	26	27	608
2015		20	17	24	24	22	15	34	17	11	24	11	14	233
2016		20	26	27	20	30	23	25	16	14	25	16	19	261
2017		24	15	21	31	26	14	16	13	15	15	20	16	226
2018		23	21	15	15	21	11	22	13	9	16	18	17	201
2019		16	16	18	29	15								94

The following questions are not tracked for previous years, the data below covers DPA's from Feb 2018 to May 2019

- b. Average down payment: \$207.56
- c. Average term in months: 31 months
- d. Average dollar amount of arrears made subject to a DPA: \$ 1,051.99
- e. Average monthly installment of DPAs: \$73.18

New Jersey Residential
Deferred Payment Arrangement Statistics
Data as of March 31, 2019

Total Active Deferred Payment Arrangements (DPA's);

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Average
2017	30,786	32,133	23,811	23,848	22,125	21,471	21,677	21,043	22,102	22,273	23,869	23,611	24,062
2018	25,108	26,045	27,494	23,207	21,761	21,265	20,169	20,280	21,370	21,502	23,120	21,952	22,773
2019	22,196	21,673	21,735										21,868

New Established Deferred Payment Arrangements (DPA's);

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2011	1,429	1,458	3,852	4,375	4,176	4,225	5,361	6,547	7,593	7,654	4,143	1,668	52,481
2012	1,866	1,575	3,467	4,691	4,260	4,624	4,473	6,982	7,118	8,605	3,172	1,067	51,900
2013	1,685	1,703	3,277	5,209	5,667	4,649	5,319	7,062	7,802	9,145	4,179	1,309	57,006
2014	1,437	1,294	3,297	4,478	4,628	4,112	6,541	5,270	7,424	6,457	3,395	930	49,263
2015	586	1,443	2,228	2,659	2,458	5,758	5,890	6,331	8,414	7,829	9,038	8,765	61,399
2016	5,343	6,938	6,998	10,249	11,897	12,051	9,381	11,916	15,018	13,670	13,027	9,334	125,822
2017	10,139	6,308	6,763	7,770	7,252	7,191	7,034	8,142	8,902	7,563	7,659	5,944	90,667
2018	6,306	5,433	5,617	5,038	5,725	5,561	5,418	6,558	7,042	8,062	7,981	6,042	74,783
2019	6,751	5,756	6,341										18,848

Average down payment (in dollars) of DPA's;

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Average
2011	193	221	235	237	225	229	229	245	257	239	218	188	226
2012	248	216	239	200	216	216	214	231	228	215	240	234	225
2013	224	236	253	236	236	235	226	240	239	245	208	227	234
2014	165	185	167	232	241	217	230	226	226	228	197	169	207
2015	120	130	198	199	215	239	182	181	201	179	169	138	179
2016	155	184	229	252	196	182	156	154	173	187	164	134	181
2017	154	161	227	380	336	326	289	289	273	275	210	176	258
2018	187	209	212	310	281	280	270	258	257	261	214	177	243
2019	181	182	208										190

New Jersey Residential
Deferred Payment Arrangement Statistics
Data as of March 31, 2019

Average term (in months) of DPA's ;

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Average
2011	8	8	9	9	10	10	10	10	10	10	10	8	9
2012	7	8	9	10	10	10	10	10	10	11	10	10	10
2013	8	8	9	10	10	10	10	10	10	10	10	9	10
2014	9	10	11	11	11	12	11	11	11	11	11	11	11
2015	12	12	12	12	12	12	11	11	11	12	12	12	12
2016	12	13	13	12	12	12	12	12	12	12	12	12	12
2017	13	12	12	11	11	10	10	10	10	10	11	11	11
2018	11	11	11	10	10	10	10	10	10	10	11	11	10
2019	12	11	10										11

Average dollar amount of arrears made subject to a DPA;

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Average
2011	701	733	942	984	985	1,041	1,029	1,049	1,004	983	895	743	924
2012	649	553	705	760	743	791	749	702	700	670	616	572	684
2013	643	590	709	739	830	794	777	749	731	704	653	630	712
2014	626	713	899	1,042	1,147	1,100	1,061	963	952	950	817	721	916
2015	749	848	1,040	1,300	1,237	1,187	960	947	970	1,006	1,085	978	1,026
2016	1,071	1,357	1,470	1,405	1,371	1,362	1,346	1,333	1,304	1,201	1,239	1,105	1,297
2017	1,274	1,231	1,267	1,412	1,237	1,154	1,146	980	942	922	813	842	1,102
2018	793	887	952	1,061	961	922	859	858	855	868	855	842	893
2019	887	923	934										914

New Jersey Residential
Deferred Payment Arrangement Statistics
Data as of March 31, 2019

Average monthly installment of DPA's;

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Average
2011	59	58	71	74	73	75	74	75	73	72	67	58	69
2012	108	75	89	73	74	77	72	67	69	63	59	56	74
2013	81	77	79	79	75	73	73	73	73	73	73	80	76
2014	48	49	62	71	77	74	72	68	67	68	60	52	64
2015	48	58	71	80	83	77	66	66	69	64	75	73	69
2016	81	99	102	112	106	106	79	78	80	77	85	84	91
2017	99	98	101	114	93	87	69	77	72	63	69	64	84
2018	65	65	74	82	77	73	69	69	67	68	66	64	70
2019	61	71	88										73

Number of defaulted DPA's;

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2011	45	396	781	1,333	2,595	3,024	3,622	4,407	5,468	5,001	5,690	5,587	37,949
2012	74	499	830	1,504	2,538	2,962	4,321	5,907	5,647	6,487	1,782	305	32,856
2013	44	428	703	1,362	2,564	2,962	4,389	5,145	5,124	5,378	4,939	5,895	38,933
2014	64	331	666	1,216	2,077	2,591	3,920	5,139	6,453	5,610	4,505	6,495	39,067
2015	93	94	211	1,222	1,311	1,760	3,325	6,466	4,877	6,420	5,648	6,269	37,696
2016	280	680	2,873	4,907	6,615	10,260	7,404	8,232	7,977	10,735	8,180	9,922	78,065
2017	134	439	5,709	4,693	6,222	5,350	4,798	6,436	5,827	6,995	6,999	7,099	60,701
2018	5,915	4,856	n/a	12,676	8,538	6,946	7,316	7,373	6,628	9,166	6,915	8,065	84,394
2019	7,744	7,069	7,123										21,936

New Jersey Residential
Deferred Payment Arrangement Statistics
Data as of March 31, 2019

Number of completed (or "successful") DPA's;

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2011	30	81	163	192	274	352	286	351	333	396	426	512	3,396
2012	38	129	142	214	268	272	314	310	273	311	135	43	2,449
2013	21	80	135	219	286	262	315	276	270	372	450	673	3,359
2014	90	80	92	141	220	193	281	226	231	319	505	309	2,687
2015	187	446	417	641	429	495	581	762	1,093	545	428	237	6,261
2016	148	580	951	1,130	1,361	1,529	1,249	1,931	3,981	825	869	835	15,389
2017	38	167	1,027	887	1,411	1,455	1,738	1,852	1,912	2,200	1,361	1,128	15,176
2018	1,329	1,225	n/a	1,270	1,320	1,106	1,074	1,122	938	1,179	804	1,133	12,500
2018	1,099	997	992										3,088

Post-Bankruptcy Deferred Payment Arrangements												
Post Bankruptcy DPA's	Deferred Payment Arrangement Summary							Customer Information				
Time Period	Total DPA's	Defaults	% Default	% Satisfied	% Satisfied	Active DPA	% Active DPA	Customer Count	DPA Resets	Remains Active	Final Billed	
5/16/2011 - 12/31/2011	1,167	1,075	92%	92	8%	0	0%	872	295	703	168	
1/1/2012 - 12/31/2012	2,036	1,786	88%	69	3%	181	9%	887	1,149	793	94	
1/1/2013 - 12/31/2013	2,330	1,973	85%	88	4%	158	7%	1,387	943	1,259	128	
1/1/2014 - 12/31/2014	2,289	1,868	82%	68	3%	352	15%	1,349	940	1,247	102	
1/1/2015 - 12/31/2015	1,758	1,262	72%	173	10%	323	18%	937	821	870	67	
1/1/2016 - 12/31/2016	3,416	2,749	80%	156	5%	511	15%	1,665	1,751	1,485	180	
1/1/2017 - 12/30/2017	3,018	2,489	82%	32	1.1%	497	16.5%	1,475	1,543	1,285	190	
1/1/2018 - 12/31/2018	3,279	2,715	83%	42	1.3%	522	15.9%	1,509	1,770	1,327	182	
1/1/2019 - 3/31/2019	1,342	753	56%	41	3.1%	548	40.8%	1,271	71	1,211	60	
All Post - BKY DPA's	20,635	16,670	81%	761	4%	3,092	15%	11,352	9,283	10,180	1,171	

Company Name: Rockland Electric Company
Case Description: Rockland Electric Company 2019 Rate Case
Case: ER19050552

Response to BPU Interrogatories – Set RCR-CI
Date of Response: June 27, 2019
Responding Witness: Rockland Electric Company

Question No. : 12

Please provide any internal memos, reports, or presentations regarding the quality of the Company's customer service for the period from January 1, 2013 to the present.

RESPONSE: (do not edit or delete this line or anything above this)

Regarding such formal memos, reports or presentations, for the period from January 1, 2014 to the present, please see Attachment RCR-CI-12. Please also see the ATIP Dashboards included in RCR-CI-10-Attachment A – Confidential, attached to the Company's response to RCR-CI-10.

JD Power Corporate Citizenship

David Braunfotel

January 30, 2017

Awareness of Assistance Programs

