

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

At a session of the Public Service
Commission held in the City of
Albany on August 2, 2017

COMMISSIONERS PRESENT:

John B. Rhodes, Chair
Gregg C. Sayre
Diane X. Burman
James S. Alesi

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)

BY THE COMMISSION:

INTRODUCTION

In January 1992, the Commission ordered certain New York utilities to begin providing standardized customer service reporting metrics to the Commission.¹ In March 1993, the Commission directed the utilities to implement certain changes and clarifications to the customer service reporting metrics.²

In May 2016, a Draft Revised Customer Service Metrics document (Metrics Document) was issued for comment.³ Based on the Metrics Document, and the comments received, the Commission

¹ Case 91-M-0500, Customer Service Standards, Order Directing Utilities to supply Service Data (issued January 16, 1992) (Customer Services Standards Order).

² Case 91-M-0500, supra, Untitled Order (issued March 16, 1993).

³ Case 15-M-0566, Revisions to Customer Service Performance Indicators, Notice Seeking Comments (issued May 26, 2016).

hereby adopts the revised customer service reporting metrics, with modifications.

BACKGROUND

The Commission is responsible for overseeing the quality of utility services.⁴ The Commission assures service quality in several ways, including the use of performance metrics that are measured by applying utility self-reported data. Major New York State electric and natural gas utilities are required to file monthly reports that provide self-reported data regarding customer service performance.⁵

The Commission's effective oversight is necessarily dependent on the accuracy of such self-reported data. For that reason, on August 15, 2013, pursuant to Public Service Law (PSL) §66(19), the Commission instituted a proceeding for an independent third-party consultant to conduct a focused operations audit of the accuracy of the self-reported data regarding electric reliability, gas safety and customer service provided by New York State's major gas and electric utilities.⁶

On December 19, 2013, the Commission approved the selection of Overland Consulting (Overland) to conduct the audit. In April 2015, Overland filed its findings and recommendations in the "Operations Audit of the Accuracy of New York State Utilities' Self-Reported Data" (Final Report). The Commission has released the Final Report.⁷

⁴ See PSL §§65, 79, 89-b, and 91.

⁵ Case 91-M-0500, supra.

⁶ Case 13-M-0314, Consolidated Edison Company of New York, Inc. et al. Electric, Gas and Customer Service Audit (RFP Issued August 15, 2013).

⁷ Cases 13-M-0314 and 15-M-0566, supra, Order Releasing Report and Providing Guidance on Response (issued April 20, 2016) (Guidance Order).

The customer service recommendations are in two main categories. Fifty-four recommendations concern the need for improved internal processes and controls designed to ensure that customer service data is tracked and reported accurately. These recommendations are addressed in the Audit Implementation Plans each utility has filed with the Commission.⁸ The remaining 174 recommendations concern specific details of how metrics should be calculated and what subject areas should be measured. Overland concluded there was a lack of uniformity that made comparing the utilities' metrics with each other difficult.

In the Guidance Order, the Commission directed that the remaining 174 customer service recommendations listed in the Final Report be remanded to this proceeding for further consideration.⁹ The Final Report acknowledged that the development of effective metrics would be enhanced by Department of Public Service Staff (Staff)-led workshops, and that the results of these workshops should take precedence over the utility-specific recommendations in the Final Report.

An initial meeting with utilities and Staff was held on June 10, 2015 followed by a series of individual workshops focused on the specific metrics. Those workshops provided valuable information and feedback which further informed

⁸ Case 13-M-0314, supra, Data Audit Implementation Plan (NYSEG and RG&E) (filed May 20, 2016); Central Hudson Gas & Electric Corporation's Comprehensive Operations Audit Implementation Plan (filed May 20, 2016); Consolidated Edison Company Of New York, Inc. Implementation Plan (filed May 20, 2016); Orange And Rockland Utilities, Inc. Implementation Plan (filed May 20, 2016); Operational Audit Implementation Plan (National Fuel Gas Distribution Corporation) (filed May 20, 2016); and Operations Audit of the Accuracy of New York State Utilities' Self-Reported Data (National Grid) (filed May 20, 2016).

⁹ Id.

participants as to how the recommendations might be implemented in an effective manner.

Based on the input and discussions from the workshops, Staff developed the Metrics Document.¹⁰ The Metrics Document included modifications to each of the reporting metrics, including: Appointments Kept; Adjusted Bills; Telephone Answer Response; Non-Emergency Response; Estimated Bills; Customer Satisfaction Surveys; and, Public Service Commission Complaint Rates. The Guidance Order directed issuance of a Notice inviting comment on the Metrics Document.

NOTICE OF PROPOSED RULE MAKING

Pursuant to the State Administrative Procedure Act (SAPA) §202(1), a Notice Soliciting Comments was published in the State Register on June 22, 2016 [SAPA No. 16-M-0566SP1]. The time for submission of comments pursuant to the Notice expired on August 8, 2016. Moreover, in a Notice Seeking Comments (issued May 26, 2016), comments due July 20, 2016 were solicited.

Comments were submitted by Central Hudson Gas and Electric Corporation (Central Hudson); Consolidated Edison Company of New York, Inc. (Con Edison); Orange & Rockland Utilities, Inc. (O&R); National Fuel Gas Distribution Corporation (National Fuel); The Brooklyn Union Gas Company d/b/a National Grid NY, KeySpan Gas East Corporation d/b/a National Grid and Niagara Mohawk Power Corporation d/b/a National Grid (National Grid); and, New York State Electric & Gas Corporation and Rochester Gas and Electric Corporation (NYSEG/RG&E), and the concerns raised were later clarified by

¹⁰ Case 15-M-0566, supra, Draft Revised Customer Service Metrics Manual (issued May 26, 2016).

Staff. The comments received are addressed in the discussion in this Order.

LEGAL AUTHORITY

Under PSL §66(19), the Commission has the authority to order management and operations audits for gas corporations, and the subject corporations are required to submit implementation reports within 30 days of an audit's issuance. Under PSL §66(10), the Commission may require gas corporations to provide answers to specific questions that it deems necessary.

DISCUSSION

In the discussion that follows, the Commission addresses the comments of the parties, and resolves the issues raised. Unless specifically modified or rejected, the proposed modifications in the Draft Revised Customer Service Metrics are adopted. All authorized changes are reflected in the revised Metrics Manual¹¹, which is attached as an Appendix to this Order.

General Considerations

While the utilities generally support the focus on updating and standardizing the monthly customer service reporting metrics, they also note that, due to many differences among the various utilities, including the type of service provided (i.e., combination electric and gas service vs. gas service only), differences in business processes, and in customer information systems (CIS), complete standardization may be an unachievable goal. They also note that the changes should pertain exclusively to the monthly customer service reporting metrics, and not the same or similar measures that apply under

¹¹ The Commission notes that this Metrics Manual concerns changes to the reporting of customer service metrics, not changes to the metrics themselves.

individual utility customer service incentive mechanisms. Those changes should be implemented only within the context of utility rate cases.

Questions have arisen regarding the definition and reporting of specific performance indicator elements ever since utilities first began reporting the data in 1992; mostly due to limitations in utility systems and business processes. For example, the Customer Service Standards Order noted that Orange and Rockland and (then) Brooklyn Union Gas were not able to report call answer rates on a 30 second interval, as their telephone systems record answer time differently.¹²

The set of customer service metrics described in the Manual were developed in collaboration with the utilities, and are intended to achieve, to the extent practicable, consistency in how customer data is tracked and reported, while maintaining relevance to the customer experience, and practicality of administration. The Commission recognizes that absolute consistency is an impractical goal; however, utilities shall make efforts to adhere to the standards to the greatest degree possible. In addition, as noted by National Grid, the workshop participants agreed that utilities would identify any departures from the standards (e.g., differences in the types of calls or service jobs tracked and reported). Such differences shall be explicitly noted on the monthly report.¹³ The utilities will include footnotes in their monthly metric reports if there are variances from the required data that is or is not captured in their reports.

The utilities, except for National Fuel, are subject to customer service performance incentive mechanisms, which

¹² Customer Service Standards Order, p. 7.

¹³ National Grid, p. 2.

apply earnings consequences to utility shareholders that reflect the quality of service provided to customers. As a product of utility rate cases, such metrics are governed by the definitions adopted in utility rate plans. As utilities file new rate cases, the Commission will look for opportunities to conform those definitions to those adopted here.

While National Fuel is not subject to an incentive mechanism for customer service, the Commission believes that it is still necessary for National Fuel to continue reporting its performance in this area. In its last rate proceeding¹⁴, which was a litigated proceeding, the Commission did not impose any financial adjustments based on customer service standards because of National Fuel's record on customer service and the fact that the case did not include a multi-year rate plan. While an incentive mechanism might not now be needed in National Fuel's case, the company should continue to report its customer service performance levels because such information is needed to monitor whether National Fuel is continuing to acceptable levels of customer service.

Another general consideration addressed by the utilities in their comments relates to retention of records. National Grid was among several utilities that opposed the ten-year retention period recommended in the Overland Audit.¹⁵ A ten year retention requirement is unduly burdensome, and unnecessary for records related to customer service metrics. The utility performance reports are retained by the Commission, and are permanent records. Documentation supporting the last two

¹⁴ Case 16-G-0257, National Fuel Gas Distribution Corporation - Rates, Order Establishing Rates for Gas Service (issued April 20, 2017), pp. 64-65.

¹⁵ National Grid, pp.10-11.

calendar years will provide an auditable record if, in the future, the Commission wishes to examine whether a utility is calculating the metrics correctly. The Commission hereby adopts for all measures, as proposed in the Manual for several of them, retention of auditable data for a period of two calendar years prior to the reporting date.

Appointments Kept

The draft Appointments Kept metric includes definitions of Appointment Made, Appointment Kept and Appointment Missed. The utilities sought clarification of the definition of various job types and their different capabilities to track them. National Fuel and NYSEG/R&GE contend that the inclusion of routine service turn-ons/turn-offs would greatly increase the number of appointments that are tracked, and negatively impact customer service standards. National Fuel states that measuring appointments kept performance will drive utilities to schedule all-day appointments.¹⁶ NYSEG/RG&E requests that "regular service turn on/turn off" be clearly defined, as "it is unclear if services that [only] require a meter reading... should be included."¹⁷

Conversely, other utilities propose excluding appointments that are minor fractions of overall activity. For example, Con Edison and O&R propose the exclusion of drop service appointments from the Appointments Made metric, since these appointments are infrequent.

National Grid raised concern that the Appointment Kept metric includes only appointments within routine business hours. According to the Company, it currently tracks and reports out-of-hours and weekend appointments and, as written, the metric

¹⁶ National Fuel, p. 3.

¹⁷ NYSEG/RG&E, p. 2.

would place undue burden to separate the appointments within specific timeframes from those outside normal business hours.

An appointment is a "scheduled meeting between the utility and the customer (or customer representative) at the customer's premises."¹⁸ The Customer Service Standards Order established that customers should be allowed to request and make appointments, where practical, in half-day intervals.¹⁹ If the customer need not be present, e.g., to activate an outside meter, it is not an appointment made for the purposes of this measure. If appointments that are made for turn-on/turn-offs are a significant portion of service appointments, as likely they are for many utilities, their exclusion would paint an inaccurate picture of whether appointments are being kept. Turn-ons/turn-offs, where a scheduled appointment with the customer is required, will be included as a job type. The job types listed in the Manual are adopted, and National Grid and other utilities shall identify any departures from the definitions and note them on their monthly reports. The existing standard is not restricted to normal business day appointments. Only National Grid objected to the exclusion of after-hours appointments; however, as written, the term "normal business hours" is undefined. This change is rejected. Utilities who arrange appointments outside of normal business hours shall include this data in Appointments Kept (or note exceptions on their reports).

National Fuel states that the Manual fails to recognize the well-established practice of appointments that are made on a "will call" basis, where the customer requests a call ahead to confirm customer availability for the appointment. The

¹⁸ Manual, p. 2.

¹⁹ Customer Service Standards Order, p. 14.

Company argues that such appointments should be considered "kept" if the customer does not answer or is not available.²⁰ Such situations are not kept appointments; instead, the appointment shall be considered not made and therefore not part of the activity reported.

National Fuel also recommends an amendment to the exemption for cancellation or rescheduling appointments on the same day when there is extreme weather, emergencies or other events beyond a utility's control. The Company states that the reference to "major storms" as defined in Part 105 of the Commission's regulations is insufficient for gas utilities, as it pertains only to electric service. National Fuel proposes that the definition be amended to include any day on which the utility voluntarily suspends termination activity due to weather conditions. As termination activity may be suspended for a variety of reasons, the reference to Part 105 will be deleted from the definition of exclusions. Instead, the Manual will provide that appointments will be considered cancelled on days affected with severe weather events, including hurricanes, tornadoes, flash floods, lake-effect snow bands and blizzards.

The utilities all opposed the inclusion of the 15 minute wait period requirement, claiming it will increase costs and negatively impact customer service standards, due to longer appointment windows with fewer appointments being conducted. This criteria requires that if utility representative arrives at the customer premises before the scheduled appointment window, and the customer does not answer, the representative must wait at least 15 minutes past the start of the appointment window period for the appointment to be considered kept. Con Edison and O&R argue that the rule is inconsistent, because if an

²⁰ National Fuel, p. 4.

employee arrived precisely on time (e.g., at 1:00 PM for an appointment scheduled between 1:00 PM and 5:00 PM), the appointment would be considered kept; however, if the employee arrives early, the employee would have to wait until at least 1:15 PM for the appointment to be considered kept.

The Commission agrees with the utilities that the 15 minute rule is inconsistent with the balance of the standard, and it is therefore rejected. In cases of early arrival, the employee must wait at least until the start of the appointment. The language of Appointment Kept 1.b.ii. shall be modified to eliminate the 15 minute wait period and, instead, require a utility representative to wait until the beginning of an appointment window before leaving.

National Fuel proposes that the Commission reconsider the language in Section 1.d.ii regarding communications with a customer regarding changes to appointments from "at least a day ahead" to "prior to the day of the scheduled appointment," to indicate that the call does not have to occur at least 24 hours before the originally scheduled date. This proposal is reasonable, and is adopted.

The Metrics Manual states, "All utilities have indicated policies exist that for any missed appointment, a customer would receive a credit to his or her account. Credit amounts vary amongst utilities; credit amounts may or may not be included in their respective tariff rate plan." National Fuel notes that this statement is untrue, as the Company does not have such a tariff provision. This language is irrelevant to the definitions of Appointment Made, Appointment Kept and Appointment Missed, and shall be deleted from the Manual.

Adjusted Bills

An adjusted bill is a second or subsequent bill that is rendered in order to correct a previously rendered bill for

service. Central Hudson, Con Edison and O&R, National Fuel, National Grid, and NYSEG/RG&E, recommend exclusion of ESCO-related bill adjustments from Adjusted Bills. NYSEG/RG&E notes that ESCO-related bill adjustments have been excluded historically. National Grid notes that under the Uniform Business Practices, a utility does not have an obligation to issue a corrected bill for an ESCO error since it is not under the utility's control.

Con Edison, O&R, and National Fuel also believe that the metric should exclude adjusted bills associated with meter tampering theft of service or shared meter conditions. They contend that although the utility is responsible for detecting and remediating such conditions, they should not be held responsible for instances of illegal action by the customer which must be addressed through a bill adjustment.

The Commission agrees that treatment of bill adjustments related to theft of service, shared meters or ESCO bill adjustments should not be included in the metric, as they are not under a utility's control. Companies that include this information in their adjusted bill data and cannot easily exclude such data should so indicate through a footnote on the monthly report.

Telephone Answer Response

The Telephone Answer Response metrics include criteria for total incoming calls received, percent of calls answered, total number of calls requesting a representative, and percent of calls answered by a customer service representative (CSR) within 30 seconds. Comments by the utilities focused on the exclusion of dedicated lines from the metric and the treatment of abandoned calls in the calculation.

Dedicated lines are telephone lines provided to customers for a specific service. Examples include calls for

facilities construction and calls originating from a social services agency. Central Hudson does not agree with the exclusion of dedicated lines as part of the total number of calls requesting a CSR. The Company currently incorporates dedicated lines in its telephone response data, including electric emergency calls, which are rerouted to its general telephone line. Con Edison and O&R request that the Commission continue to allow a utility to either include or exclude calls to dedicated lines or vendors in the metric, so long as each utility explicitly identifies what is included in the metric.

The current telephone answer rate metric applies to facilities established by the utility for the regular transaction of business. The Commission will continue this provision, which excludes dedicated lines. Given that utilities vary greatly in the number and variety of dedicated lines employed, and in their ability to exclude them from measurement, each utility shall note in their monthly report, the types of calls, if any, that are excluded from measurement. NYSEG/RG&E states that it excludes collection-related calls. These are among the most frequent reasons for customers to call their utility, and their exclusion represents a significant omission from measurement of telephone answer response. The Companies are directed to file a plan for including such calls in their telephone answer response metric, within 90 days of this Order.

Central Hudson, Con Edison, O&R, National Fuel propose the exclusion of abandoned calls from the metrics. Reasons given include that they are out of a utility's control, and that they cannot be measured accurately.

NYSEG/RG&E recommends excluding calls that do not reach the interactive voice response (IVR) before disconnecting from the definition of total incoming calls, as its system does not have the capability to track calls that are abandoned before

reaching the IVR. National Fuel observes that the metric focuses on utilities which use an IVR system. National Fuel proposes that the percent of calls answered within 30 seconds should equate to calls answered within 30 seconds divided by total calls received, minus calls abandoned within 30 seconds.

For utilities with IVR systems, the point at which measurement begins has been, and shall remain, the point at which the customer requests to speak with a CSR (i.e., as opposed to those who choose to conduct an automated transaction through the IVR). For utilities without an IVR, that point occurs the moment the call connects.

The utilities rightly point out that there are many reasons why a customer may abandon a call before it is answered by a CSR; however, the metric intends to measure the number of calls that are answered within 30 seconds. National Fuel's suggestion that the number of calls answered exclude those abandoned within 30 seconds therefore is sensible, and is adopted. Utilities that cannot exclude calls abandoned before 30 seconds have elapsed, and/or cannot include calls abandoned after that time, shall so note their monthly reports.

Non-Emergency Service Response

The Non-Emergency Service Response Metric focuses on customer initiated work in the following categories of job types: number of meter-related service requests; average number of days to complete (meter related service requests); number of other service-related work; and, average number of days to complete (other service-related service requests).

Most of the utility comments in this area were focused on the types of service jobs included. Con Edison, O&R, National Fuel, and NYSEG/RG&E consider the language "including, but not limited to" in relation to the job types too general.

Con Edison and O&R seek to exclude noisy meters and broken glass from the types of jobs that are included in this metric.

According to National Grid, the topic that caused the most dissention in the Non-Emergency Service Response working group was the differences between the operations-related job types. National Grid proposed excluding from the metric disconnect and reconnect for customer premises, lawn work, driveway work, and street repairs. The Company states these job types are done by the operations function and tracked manually, while its information services system monitors and generates reports for Non-Emergency Service Response. The Company states that the exclusion of the operations-related work is necessary as the majority of this work is done by outside contractors.

National Grid notes that the job types used within the Non-Emergency Service Response metric should mirror the same types included in the Appointments Kept metrics. Conversely, National Fuel contends that regular service turn-ons/turn-offs should not be included in this metric, as it has been captured in the Appointments Kept metric. National Fuel also proposes the exclusion of shared meter billing, since landlords can prohibit the Company from looking at the meter; and, therefore, prevent a field representative from completing the work in a timely fashion.

NYSEG/RG&E states that requests for service represent the largest volume of non-emergency jobs and would provide more consistent reporting among the utilities. The Companies propose that language be modified to provide two distinct categories for requests for service for residential and non-residential customer to be consistent with HEFPA.

The utilities also argue that the "start clock" for appointments begin on the date work is scheduled at the customer's premises, since appointments are arranged around the

customer's schedule. The utilities advised Staff that the majority of appointments are scheduled at dates and times convenient for the customer or another party, such as a building contractor. These appointments may be scheduled weeks in advance. Setting a specific timeframe on when an appointment is made until it is kept would place undue burdens on the utilities, particularly in these instances.

The Customer Service Standards Order included the provisions for appointments kept [§15.7(c)] in the same section as non-emergency service response times [§15.7(a)] and utility complaint investigations [§15.7 (b)].²¹ Appointments kept was designed to measure work in the same categories as §15.7(a) and (b). The Commission therefore always intended that these measures should be closely related and complementary.

Appointments Kept is expressed simply as the percentage of appointments that are timely kept. Service response time is expressed as the percentage of jobs that are completed within "X" days, with "X" referencing a standard to be developed; however, such a standard has not been adopted by the Commission to date. Furthermore, as noted by NYSEG/RG&E and other utilities, a significant factor in the number of days to complete such a job is the lead time the customer allows in scheduling an appointment, where the customer may call days or even weeks in advance of the need date.²² In such cases, National Fuel proposes that the clock start on the date mutually agreed by the customer and the company, rather than the date of the call to schedule the appointment.²³ While this avoids counting the lead time allowed by the customer, such a metric

²¹ Case 91-M-0500, supra, Customer Service Standards Order, at 12-13.

²² NYSEG/RG&E, p. 7.

²³ National Fuel, p. 7.

would add little to the measure of Appointments Kept that is already tracked.²⁴ For these reasons, the Commission determines that the non-emergency service response time measure shall be withdrawn.

Estimated Bills

An estimated bill occurs when the utility renders a bill based on an estimated reading because it did not obtain an actual reading at the time of a regularly scheduled meter reading. Con Edison and O&R state that a reading may be rejected by its billing system as "abnormal," i.e., reflecting unusually large usage for the account. In such cases, the actual reading will be replaced by an estimate. The Companies request clarification whether this should be counted as an estimated reading. Since the utility obtained an actual reading, an estimated bill is not rendered because an actual reading was not obtained. Therefore, such a reading shall not be counted as an estimate.

Con Edison and O&R also request clarification on whether scheduled meter reads include all meters, regardless of active or inactive status, in the metric. The Companies state that estimated bills are not produced on meters that are inactive and should not be included in the metric. The Commission agrees; meter readings scheduled on inactive accounts shall not be counted.

National Fuel proposes to exclude pro-rated bills from the estimated bill count, as these bills are based on actual readings that occurred on a day different than the scheduled read date. According to the company, customer readings or interim readings are used when the scheduled meter reading

²⁴ In addition, as noted by National Grid, the measure does not address situations where the utility cannot complete a job due to extenuating circumstances, e.g., access issues.

cannot be done. Since the bill is estimated for the full month based on an actual reading for a part of the month, the Company does not believe such readings should be classified as estimated readings. Estimated readings are always based on previous actual readings; however, whether for the prior month, the same month in the prior year, or other available meter data for the premises. While an interim reading may provide a more certain estimate, it is still an estimate, and shall be counted as such.

National Grid expresses concern with the monthly reporting of the automated meter reading (AMR) and advanced metering infrastructure (AMI) penetration within the metric, since its current AMR saturation levels are greater than 95 percent. The purpose of this requirement is to document the degree to which a utility relies on manual meter reading to produce bills. A high degree of specificity is not required; however, National Grid should be able to provide greater accuracy than the nearest 5%. Reporting AMR/AMI penetration to the nearest whole percentile shall be satisfactory.

NYSEG/RG&E seeks clarification on the definition of "other Commission-authorized estimated readings." The Commission authorizes regularly scheduled alternate-month estimated readings for certain utilities that read meters bimonthly and bill monthly. At this time, there are no other Commission-authorized estimated readings; however, given that the Commission has defined this metric as estimated readings that occur when the utility renders a bill based on an estimated reading because it did not obtain an actual reading at the time of a regularly scheduled meter reading, this degree of specificity is not necessary. The language will be withdrawn. If there is no scheduled actual reading, the metric shall not apply.

Customer Satisfaction Surveys

The Metrics Manual provides for the development of a statewide customer satisfaction survey to obtain accurate and consistent data for comparison among the utilities; or alternatively, a survey question that focuses on overall customer satisfaction, that is asked and scored in a consistent manner at all utilities. The utilities generally opposed the statewide survey, indicating that developing a uniform statewide survey involved redundancy and survey fatigue for customers, increased costs, ignored regional differences, and provided little value.

NYSEG/RG&E disagrees with the statewide survey proposal concerned that customers will experience survey fatigue. It suggests that if such a survey is developed, there should be uniformity in data collection and consistency in calculations. In order to promote uniformity, NYSEG/RG&E proposed that Staff implement the statewide survey as a single administrator. NYSEG/RG&E also seeks clarification as to the whether the survey would be transaction based or perception based.

National Grid expresses concern that customers who receive both gas and electric service from the same utility will have different experiences and, therefore, will provide different responses when they receive the survey compared to customers that receive the two services from different utility companies. National Grid's justification is that gas customers who have higher bills tend to have lower customer satisfaction levels compared with those who only have electric services; due to their perception of bill amounts. For similar reasons, National Fuel recommends exclusion of ESCO customers.

Several utilities recommend that a collaborative be established to discuss and create a uniform statewide customer

satisfaction survey. Given that there are still many unanswered questions regarding how best to measure customer satisfaction uniformly, the Commission directs Staff to convene a collaborative with the utilities, within 90 days of the issuance of this Order, to consider the statewide customer satisfaction survey or alternatives and to issue a proposal within 6 months thereafter. In addition, the rate plans for the Brooklyn Union Gas Company d/b/a National Grid NY and KeySpan Gas East Corporation d/b/a National Grid, require those Companies to convene a meeting with Staff and interested parties to discuss aligning their respective customer satisfaction survey methodologies.²⁵ Given the collaborative established here, that process shall be merged with and subsumed under this collaborative, with the same deadlines. In the interim, all utilities will continue their existing surveys.

PSC Complaint Rates

A PSC Complaint is a dispute filed by or on behalf of a customer with Staff of the Office of Consumer Services (OCS). The PSC Complaint Rate is the annual average monthly rate of PSC Complaints per 100,000 customers.

NYSEG/RG&E requests clarification as to when the complaint data would be reported, such as by the month end, the year to date, or on a 12 month rolling average. According to National Fuel, there is no need to impose this reporting requirement on the Company, as Staff maintains all information on utility complaint rates, including publication of a monthly statewide report.

²⁵ Cases 16-G-0058, et al., Brooklyn Union Gas Company d/b/a National Grid NY and KeySpan Gas East Corporation d/b/a National Grid, Order Adopting Terms of Joint Proposal and Establishing Gas Rate Plans (issued December 16, 2016).

Utilities recommended that this metric be eliminated, as it duplicates the existing Department of Public Service process. They contend that the additional reporting places burdens on their resources as they would be reporting to the Commission information that it must obtain from Staff in the first instance, and which Staff already publishes in its monthly PSC complaint reports.

The Commission agrees that the PSC Complaint Rates metric is duplicative of the current tracking and reporting mechanism administered by Staff. Accordingly, utilities shall not be required to provide PSC Complaint Rates as part of their monthly reports; however, the Metrics Manual retains information regarding how utilities shall calculate their total number of customers, which forms the denominator of the PSC Complaint Rate.

CONCLUSION

For the reasons set forth herein, the Commission adopts the customer service reporting metrics detailed in the Appendix to this Order. Consistent with current practice, utilities shall file reports within 30 days of the close of each calendar month. Henceforth, such reports shall be filed with the Secretary, under Case Number 15-M-0566, rather than with the Director of OCS. Utilities shall begin reporting performance on these measures as soon as practicable, and in no event later than the first report that is due after 90 days from the date of this order. Beginning with such report, and on a continuing basis thereafter, each utility shall note any departures from these standards in the data that is reported.

The Commission orders:

1. Consolidated Edison Company of New York, Inc.; Niagara Power Corporation, d/b/a National Grid; Central Hudson Gas and Electric Corporation; Orange & Rockland Utilities, Inc.; Rochester Gas and Electric Corporation; New York State Electric & Gas Corporation; National Fuel Gas Distribution Corporation; The Brooklyn Union Gas Company d/b/a National Grid NY; and, KeySpan Gas East Corporation, d/b/a National Grid are directed to begin reporting performance on the customer service measures listed in the Appendix to this Order, as soon as practicable, and in no event later than the first report that is due after 90 days from the date of this order.

2. Staff shall convene a collaborative with the utilities 90 days after the issuance of this Order, to further develop the statewide customer satisfaction survey or alternatives, and to issue a proposal for statewide measurement of customer satisfaction within 6 months thereafter. The Brooklyn Union Gas Company d/b/a National Grid NY and KeySpan Gas East Corporation d/b/a National Grid shall discuss with Staff and interested parties aligning their respective customer satisfaction survey methodologies within the context of this collaborative.

3. Rochester Gas and Electric Corporation and New York State Electric & Gas Corporation shall, within 90 days of issuance of this Order, file a plan for including collection-related calls in their telephone answer response metric, or explain why inclusion of these calls is not practical.

4. In the Secretary's sole discretion, the deadlines set forth in this order may be extended. Any request for an extension must be in writing, must include a justification for the extension, and must be filed at least one day prior to the affected deadline.

5. This proceeding is continued.

By the Commission,

(SIGNED)

KATHLEEN H. BURGESS
Secretary

STATE OF NEW YORK
DEPARTMENT OF PUBLIC SERVICE

CASE 15-M-0566 - In the Matter of Revisions to Customer Service Performance Indicators Applicable to Gas and Electric Corporations.

CUSTOMER SERVICE METRICS MANUAL

Revised
February 22, 2017

CUSTOMER SERVICE METRICS MANUAL

1. Appointments Kept

Definitions:

- a. Appointment Made – A scheduled meeting between the utility and the customer (or customer representative) at the customer's premises in which a date and time or time frame is agreed upon by both parties. The measure only applies to appointments where the customer or his or her representative must be present to provide access. Subject to the terms listed below in 1(a) (b) (c) (d).
 - i. Job types included – Special Meter Reads, High Meter Test/High Bill Investigation, Shared Meter Investigation, Disconnect/Reconnect for Customer Premise Work, Regular Service Turn on/Turn off.
 - ii. For those companies whose territories extend across New York State borders, exclude appointments for customers located outside of New York State.
- b. Appointment Kept – The utility arrives at the previously agreed upon location, date, and time window.
 - i. If the customer is unavailable at the premises when the utility arrives within the scheduled appointment window, the appointment is considered kept, except as described in 1(b) (ii) below.
 - ii. Each utility shall make reasonable efforts to communicate with the customer regarding early arrival. A reasonable effort will be considered a telephone call or text in which the customer is reached or returns a voicemail or text message. If the customer is available at the premises before the scheduled time, the appointment is considered kept. If the utility arrives early and waits at the premises until the originally scheduled time window or returns within the originally scheduled window, the appointment is kept. For example, the utility arrives at the premises at 9:30 a.m. for a 10:00 a.m. - 12:00 p.m. appointment. If the customer cannot be reached, or is unavailable until 10:00 a.m., and the utility chooses to wait at the premises for the customer, the utility must wait until at least 10:01 a.m. before leaving the premises. In this case the appointment is considered kept.
- c. Appointment Missed – If the utility does not satisfy the terms of the Appointment Kept. This includes, but is not limited to, the following situations:
 - i. The utility arrives before the scheduled appointment window, the customer is unavailable, and the utility does not wait for the appointment window or return at the originally scheduled time.
 - ii. The utility arrives after the scheduled appointment window. This is considered a missed appointment, regardless of whether the customer is available.
- d. An appointment may be canceled or rescheduled by either the customer or the utility.
 - i. If the customer cancels or reschedules, the original appointment is not counted as an Appointment Made, Kept, or Missed. A rescheduled appointment will be considered an Appointment Made and is subject to the aforementioned stipulations.
 - ii. If the customer requests a call to confirm customer availability for the

appointment and the customer does not answer or is not available, the appointment will be considered cancelled.

- iii. If the utility cancels or reschedules, the original appointment is removed from the Appointment Made count, *if* the customer or his or her representative is directly notified prior to the day of the scheduled appointment. Leaving a message on an answering machine is insufficient notification. If less than day ahead notice is given, or alternatively, the customer or their representative cannot be reached, the appointment is considered missed.
- iv. In the event of a utility initiated reschedule with proper prior notice given to the customer, the rescheduled appointment will count as an Appointment Made and follow the aforementioned stipulations.
- v. On a day that is affected with a severe weather event or other emergency, the appointment will be considered cancelled, rather than missed. Examples of severe weather include hurricanes, tornadoes, flash floods, and blizzards.

Percent of Appointments Kept will be reported on a new line (1c). The calculation is shown below.

$$\frac{\text{Number of Appointments Kept}}{\text{Number of Appointments Made}} \times 100$$

Utility jobs do not have to be completed in order for an appointment to be considered “kept.” If an additional appointment is needed to complete a job/work, the additional appointment shall be counted as a new appointment.

Utilities will retain data for this metric with the goal of auditability for a period of the current year and the prior two calendar years.

2. Adjusted Bills

Definition: An adjusted bill is a second or subsequent bill that is rendered in order to correct a previously rendered bill for service.

A bill that is adjusted prior to mailing is not an adjusted bill.

Each utility will maintain a record showing the number of bills adjusted as a percentage of the number of bills issued.

An estimated bill replaced by a bill based on an actual reading is not an adjusted bill.

A combined bill including both electric and gas charges is one bill.

Each subsequent adjustment to a previously rendered bill is an adjusted bill (e.g., if a bill is adjusted and issued twice, this counts as two adjusted bills). If a bill is adjusted once or multiple times prior to the bill actually being issued, including separate adjustments to gas and electric charges on a combined bill, this is considered one adjusted bill.

Adjusted bills are reported in the month in which the adjustment occurs.

ESCO-related bill adjustments, whether customer or ESCO requested, and adjustments for theft of service and shared meters will be excluded from the adjusted bills metrics.

An adjusted bill will also count as a bill issued in the month in which the adjustment is issued.

A customer reading replaced with an actual or estimated reading does *not* count as an adjusted bill.

A change in a customer bill due to switching to or from budget billing does *not* count as an adjusted bill.

Changes to correct for the responsible billing party (e.g., where bills have been rendered to a prior resident, and bills are re-issued to the current resident), do *not* count as adjusted bills.

Electronic bills will be included in this metric.

Percent of Adjusted Bills will be reported on a new line (2c). Calculation is shown below.

$$\frac{\text{Number of Bills Adjusted}}{\text{Number of Bills Issued}} \times 100$$

Utilities will retain data for this metric with the goal of auditability for a period of the current year and the prior two calendar years.

3. Telephone Answer Response

Definitions of each metric:

- a) Total incoming calls received: All incoming calls, without exclusion.
- b) Percent of calls answered: All answered calls (by any means, including interactive voice response (IVR) or a customer service representative (CSR)).
- c) Total incoming calls requesting a representative: All calls that have requested to speak to a representative, excluding calls that are abandoned before 30 seconds have lapsed.
- d) Percent of calls answered by a representative within 30 seconds: The percentage of total incoming calls requesting a representative that were answered by a representative within 30 seconds.

Maintain a daily record of the above information.

Report the monthly total number of calls received, the percentage of calls answered during the reporting month, and the number of calls where a customer requests to speak to a representative. Of the latter, report the percent of calls answered within thirty seconds.

The response time “clock” begins after the customer completes any IVR and is transferred to the queue to speak to a representative. In the event a utility does not utilize an IVR system, the “clock” begins when the call is connected.

Regular business days are considered Monday through Friday. Regular business hours for reporting purposes may vary between utilities. Utilities will identify their business hours on their reports.

Call answer rate should measure response times for calls to the call center generally used by customers to transact business with the company. Utilities will not be required to include calls to dedicated lines (e.g., Department of Social Service inquiries, electric emergency lines, or construction-related calls). Utilities should identify any excluded call types when reporting.

Calls to contracted call centers and representatives, including those used for credit and collection calls and overflow lines, will be included.

Calls that enter the IVR then go to a CSR will be counted once, only as CSR answered calls. Calculation is below:

$$\frac{\text{Number of total calls answered within 30 seconds}}{\text{Number of total calls requesting a representative} - \text{all calls abandoned within 30 seconds}} \times 100$$

Utilities will retain data for this metric with the goal of auditability for a period of the current year and the prior two calendar years.

4. Estimated Bills

Definition: An estimated bill occurs when the utility renders a bill based on an estimated reading because it did not obtain an actual reading at the time of a regularly scheduled meter reading.

Estimated bills exclude regularly scheduled off-month estimated readings and customer readings.

Estimated bills due to no access will be counted.

Meter readings scheduled on inactive accounts shall not be counted.

Each utility will include automated meter reading/advanced metering infrastructure (AMR/AMI) penetration percentages on the PI report.

A calculation will be added (metric 4c) to report the percentage achievement. Calculation is below:

$$\frac{\text{Number of Estimated Bills}}{\text{Number of Scheduled Bills}} \times 100$$

Utilities will retain data for this metric with the goal of auditability for a period of of the current year and the prior two calendar years.

5. Customer Satisfaction Surveys

A statewide survey can be the most effective method in order to obtain comparably accurate information regarding general customer satisfaction with utilities. Such a survey may be used in addition to any existing surveys the respective utilities may already have in use.

Although the utilities generally ask survey respondents to indicate their overall satisfaction with the utility's service, it is difficult to compare answers across utilities, as there are significant differences in how this question is asked and scored. Therefore, a statewide common survey may be warranted. An alternative option to a consistent statewide survey is asking a similar question on all utility surveys, e.g.: "Overall how satisfied are you with your utility service?"

A collaborative will be established among Staff and the utilities to further examine the feasibility of a statewide survey or other alternatives to consistently obtain comparably accurate information regarding general customer satisfaction with utilities.

6. PSC Complaint Rates

PSC Complaint Rate is the annual average monthly rate of complaints per 100,000 customers.

For purposes of determining the total number of customers, a customer receiving both electric and gas service is considered one customer. The total number should be the unduplicated number of customer accounts as of December 31st of the previous calendar year.

The number of customers shall correspond to the number of accounts; i.e., a person or entity with two or more accounts shall be counted as two or more customers. Both residential and non-residential end-use customer accounts are included; other sales, e.g., sales for resale, are not. A customer is defined as a single active account recorded in a utility's billing system, regardless of the number of meters. For example, a customer may have:

- a. one electric meter and no gas meter,
- b. one gas meter and no electric meter,
- c. one steam meter,
- d. one electric meter and one gas meter, or
- e. multiple electric and/or gas meters.

A customer directly metered and billed on a utility's redistribution or submetered service class is counted as a single customer. Individual sub meters and master metered occupants provided service through a direct metered utility customer are not counted separately or included in the utility's customer total.

The monthly PSC Complaint Rate calculation is provided below:

$$\frac{\text{Monthly Escalated Complaint Total}}{\text{Customer Total}} \times 100,000$$

PSC Complaint Rates, as well as the actual numbers of initial and escalated complaints are available to the public on the PSC website. It is not necessary for utilities to include this information on monthly reports.

PSC Complaint Rate will be reported at a one tenth digit of accuracy.