

Monitoring Utility Activity

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Monitoring Utility Activity

- PUCO Call Center
- Customer Service Audits
- Tracking Consumer Contact Data
- Enforcement Options



Service Monitoring and Enforcement Department

Customer Education and Contact Division

- Chief
- Call Center Manager
- Management Analyst
- Complaint Intake Workers 12
- Trainer



Service Monitoring and Enforcement Department

- Investigation and Audit Division
 - Chief and Deputy Chief
 - Industry Supervisors 5
 - Compliance Investigators 23
 - Low-Income Program Specialist 1



Organization

- Employee skills needed
 - Communication Skills (both written and oral)
 - Problem Solving
 - Analytical Skills
 - Coping Skills
 - Ability to Interact with Others
 - Decision Making Skills
 - Call Center experience works well



Dispute Resolution Process

- Educate consumers of their rights
- Provide specific utility information
- Provide referrals
- Mediate informal consumer complaints



What is needed to handle dispute resolutions

- An easy method for customers to reach the Commission
- An internal procedure to process each type of contact
- Authority over and a working relationship with the utility companies to facilitate complaint resolution
 - Specific company contact person
 - An easy way to reach the contact person
 - Company contact with authority to resolve an informal complaint
 - Special referral number to the company
- To establish credibility with consumers
- Staff trained to handle complaints



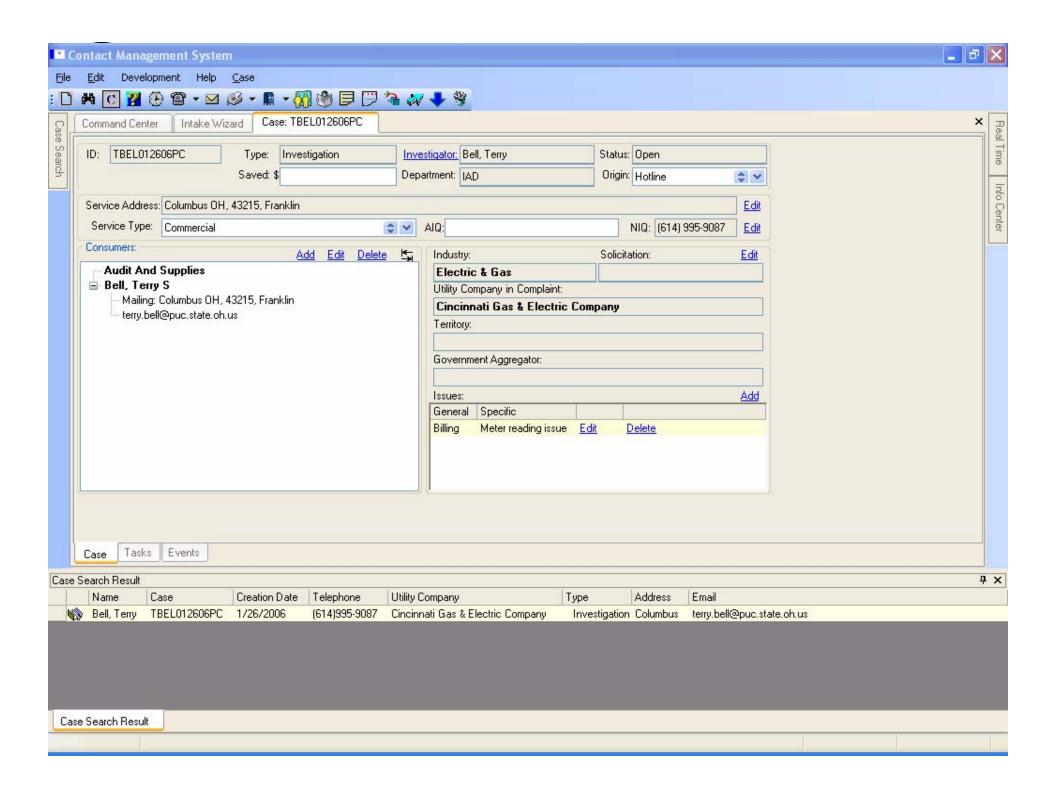
Types of Complaints

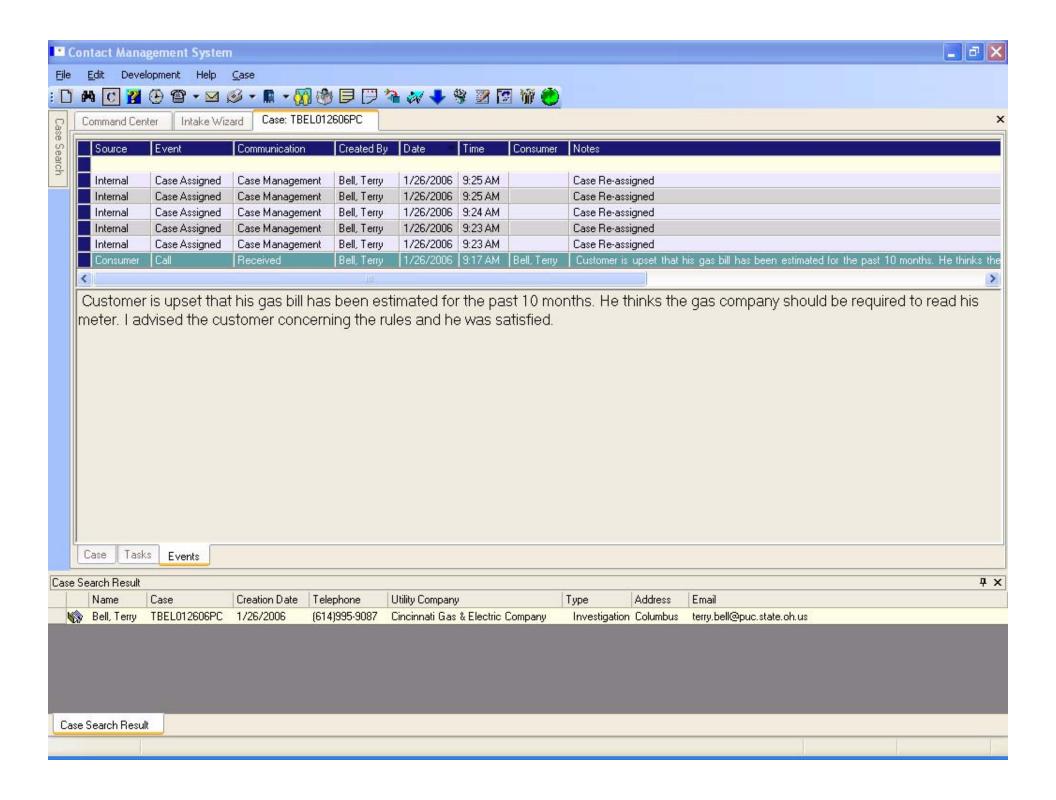
- Informal Complaint
 - IAD Responsibility
- Formal Complaint
 - Commission Responsibility



Complaint Process (Informal)

- Contact the PUCO (Toll free number, E-mail, regular mail, fax, walk-in, referral)
- Consumer record is created
- Consumer may be given a telephone number at the company to escalate the complaint
- Contact is made with the company (Three-way call, or e-mail)
- Company response
- Notify customer of response







Complaint Process (Formal)

- Complaint is assigned to an attorney examiner
- Pre-hearing settlement conference
- Hearing
- Commission decision



Customer Service Audits

- Selection Process
 - Audit Draft Completed (December)
 - Consumer Contacts (Hotline/Database)
 - Pending Rate Cases
 - Timeline
 - Trends



Pre-Audit Activities

- Audit Team Selected
- Consumer Contact Analysis
- Coordinate Field Visit
- Prepare and Send Data Request
- Pre-Audit Conference/Review Tariff



Field Audit

- On-Site Audits
 Interactive
 Visual
 Real-Time Observation of Reps/Calls
 Quicker Response Time
- Off-Site Audits
 Cost Effective
 Flexibility
 Increased Frequency
 Staffing
 Recorded Calls



Field Audit

- Entrance Conference
- Monitor Calls
- Observe Customer Service Reps
- Exit Conference



Audit Report

- Debrief audit team
- Audit Teams report due in 7 Days
- Audit report due 35 days from audit
- Report is disseminated
- Non-Compliance issues sent to Reliability and Service Analysis Division



Tracking Consumer Contact Data

Monthly Review of all "Contacts" to PUCO to quickly identify problems or negative trends



Monthly Review of Contacts

- Includes phone calls, e-mails, and letters from consumers.
- Data is entered into a central database
- Each contact is coded with company name and customer's concern
- Reports are generated from database



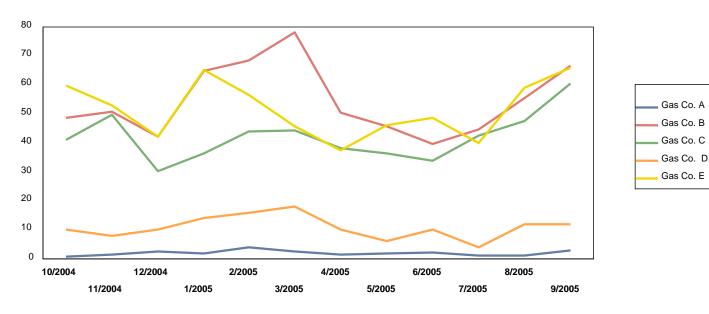
Reports

- Normalized customer contacts for all large gas companies for 12 months
- Normalized customer contacts by code (concern)
- Individual company contacts by code (concern)



Comparison of Gas Companies (all contacts)

Customer Contacts By Company Across All Codes (Contacts Per 100,000 Customers)



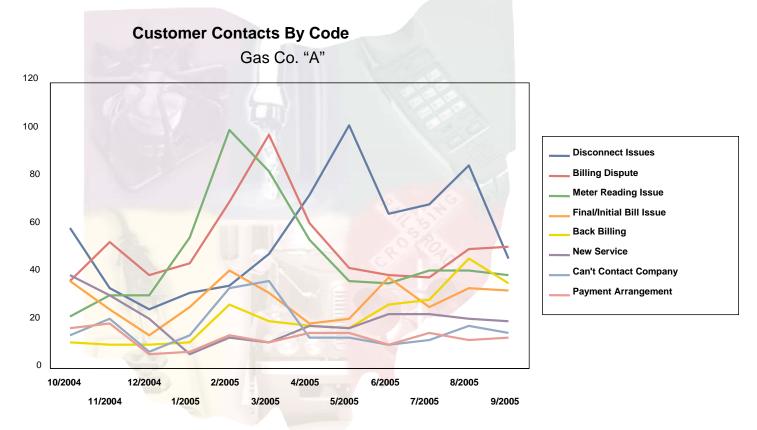


Customer Contacts by Company (Normalized)

	Gas Co. A	Gas Co. B	Gas Co. C	Gas Co. D	Gas Co. D
Disconnect Issues	.6	10.6	4.0	2.0	6.1
Billing Dispute	.6	3.3	4.4	4.0	4.8
Meter Reading Issue	.2	2.6	3.4	0.0	3.0
Back Billing	.3	2.2	3.1	2.0	.9
New Service	0.0	1.9	2.8	0.0	3.9



Individual Company Chart





Enforcement Action

- Enforcement action can be initiated by:
 - Company Audits
 - Individual Complaints
 - Monthly Contact Analysis



Enforcement Options

- Work with the company informally
- Send company an enforcement letter
- Direct the company to issue customer credits or refunds
- Direct the company to pay forfeitures (fines)
- Request a "Commissioned Ordered Investigation"



Typical Enforcement Process

- 1. Identify a possible violation via complaint or audit
- 2. Verify the violation by checking the facts and the rule
- 3. Draft an enforcement letter for review by staff attorney
- 4. Send the enforcement letter to the utility
- 5. Review the utility's compliance plan for effectiveness and timeliness



Contents of a Rule-Violation Enforcement Letter

- Statement of probable non-compliance
- Description of the utility's action
- Statement of the rule that was violated
- Request for the utility's plans and schedule for coming into compliance
- Statement of due-date for responding to the letter



Enforcement Tools

- Violation Database
 - Company
 - Rule Number
 - Date of Enforcement
- Forfeiture Assessment Worksheet
 - Nature and circumstances of violation
 - Extent and gravity
 - Culpability
 - History of prior offense