Report of the
Indiana Billing Symposium
organized by the
Indiana Utility Regulatory Commission

Tom Stanton
Principal Researcher
National Regulatory Research Institute
and
Kathryn Kline
Research Assistant
National Regulatory Research Institute

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The National Regulatory Research Institute
8611 Second Avenue, Suite 2C
Silver Spring, MD 20910
www.nrri.org
About the Indiana Utility Regulatory Commission

The Indiana Utility Regulatory Commission (IURC or Commission) is an administrative agency that hears evidence in cases filed before it and makes decisions based on the evidence presented in those cases. An advocate of neither the public nor the utilities, the Commission is required by state statute to make decisions in the public interest to ensure the utilities provide safe and reliable service at just and reasonable rates. The Commission also serves as a resource to the legislature, executive branch, state agencies, and public by providing information regarding Indiana’s utilities and the regulatory process. In addition, Commission members and staff are actively involved with regional, national, and federal organizations regarding utility issues affecting Indiana.

In its current role, the agency oversees more than 600 utilities that operate in Indiana. The Commission regulates electric, natural gas, telecommunications (limited), water, and wastewater utilities. It also has a Pipeline Safety Division that is responsible for enforcing state and federal safety regulations for Indiana’s intrastate gas pipeline facilities.

The agency is overseen by five commissioners who are appointed by the governor. Current Commissioners of the IURC are Chair Carol Stephan, Vice-Chair Carolene Mays-Medley, Commissioner Jim Huston, Commissioner Angela Weber, and Commissioner David Ziegner.

The IURC has a total professional staff of about 75 people; the majority are attorneys, engineers, accountants, and economists who review and recommend decisions on cases pending before the Commission. The agency also has a Consumer Affairs Division that serves as a liaison between utility ratepayers and the utilities.

For more information about the IURC, visit www.in.gov/iurc.
About the National Regulatory Research Institute

NRRI was founded in 1976 by the National Association of Regulatory Utility Commissioners (NARUC). While corporately independent, NARUC and NRRI are linked in multiple ways to ensure accountability. NARUC, as the association of all state regulators, is invested in quality research serving its members. NRRI coordinates its activities to support NARUC's policy, research, educational and member-support service to state commissions.

Mission Statement

To serve state utility regulators by producing and disseminating relevant, high-quality research that provides the analytical framework and practical tools necessary to improve their public interest decision-making. In all its activities, NRRI embodies the following values: relevance, excellence, objectivity, creativity, independence, fiscal prudence, ethics, timeliness and continuous improvement.

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About the Report Authors

**Mr. Tom Stanton** joined NRRI in the fall of 2010 after working for 32 years in the Michigan state government. He worked 10 years at the Michigan State Energy Office and more than 22 years at the Michigan Public Service Commission. He specializes in policy research for renewable energy, energy efficiency, smart grid, and global climate change. He earned a B.A. in Communications and an M.A. in Journalism, both from Michigan State University, as well as an M.S. in Public Administration from Western Michigan University.

**Ms. Kathryn Kline** joined NRRI as a Research Assistant in September 2015. She earned her MS in Public Policy from Georgia Tech and her BS in Political Science from Converse College in South Carolina.

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We very much appreciate the many contributions of all who attended the IURC Billing Symposium. These include IURC Commission Chair Carol Stephan and Vice Chair Carolene Mays-Medley who each attended one of the panel discussions. We thank all of the panelists whose presentations and participation formed the essence of the Billing Symposium. We also extend a special thank you to the many staff members associated with IURC External Affairs who facilitated our participation in the Billing Symposium and assisted us by providing background information necessary to completing this report. IURC staff members Chetrice Mosley, Ryan Hadley, and Megan Wade-Taxter all reviewed a draft of this publication, helping ensure our understanding and reporting of the events would be accurate and complete.

We also thank Dr. Rajnish Barua, NRRI Executive Director, who provided extensive support, encouragement, and guidance for this project as well as participated in the Billing Symposium.

Any mistakes or omissions are our responsibility, and we welcome suggestions from readers for corrections or additions. As always, we remain open to suggestions for future research topics.

- Tom Stanton and Kathryn Kline
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1 Introduction

In May 2015, Commissioner Jim Huston of the Indiana Regulatory Utility Commission (IURC or Commission) contacted the National Association of Regulatory Utility Commissioners (NARUC) and the National Regulatory Research Institute (NRRI) with an interest in exploring public utility billing practices around the nation after learning that the number one area that results in complaints received by the IURC's Consumer Affairs Division is about concerns with utility billing and billing-related communications.

In Fiscal Year 2015 (FY15), the IURC’s Consumer Affairs Division logged 4,854 complaints regarding issues with regulated utilities; this was a 14 percent increase from the previous fiscal year (4,254 complaints).¹ Of the complaints in FY15, 23 percent were billing disputes. The top five billing issues as categorized by IURC staff were (in order of volume): high bills, sub-metering, deposits, unpaid bill, and service charges. Of the total complaints the IURC received regarding regulated utilities in FY15, 38 percent were related to electric utilities, 30 percent were related to natural gas utilities, 27 percent related to water utilities, four percent to wastewater utilities, and one percent telecommunications.² The increase in volume from FY14 to FY15 presented an opportunity to foster discourse and transparency between stakeholder groups on the topic of billing practices and related consumer communications regarding billing.

After several discussions, the IURC, NARUC, or NRRI did not find another state that had performed a similar forum that brought together utilities and consumer groups to discuss billing to the degree Commissioner Huston was seeking with the intent of better understanding utility billing. At that point, Commissioner Huston and staff began planning a two-pronged approach consisting of hosting a Billing Symposium in Indiana for open discussion among stakeholders in addition to NRRI conducting primary and secondary research on billing practices around the United States. With the support of fellow commissioners and Chetrice Mosley, IURC’s Executive Director of External Affairs, and staff, Commissioner Huston was instrumental in initiating and guiding the Billing Symposium project.

2 Purpose of the Billing Symposium

The purpose of the IURC’s Billing Symposium was to bring together stakeholders and allow for discourse and deeper understanding of billing practices from the gas, electric, water, and wastewater utilities’ perspectives and the consumer groups’ perspectives. The Commission

¹ Most of the background information contained in Section 1 was provided by Chetrice Mosley IURC’s Executive Director of External Affairs, and her colleagues.

² Note that the 1 percent of telecommunications is related to complaints that are within the limited jurisdiction of the IURC after the telecommunications industry was deregulated in Indiana in 2006. However, of all calls received by the IURC’s Consumer Affairs Division (regulated and unregulated), more than 45 percent are related to telecommunications.
requested that participants engage in active listening and maintain respectful attitudes toward groups with differing opinions. Leading up to the Billing Symposium, several participants had cases pending before the Commission; therefore, the Commission requested that participants refrain from discussing issues under consideration in the active cases. Representatives of all the Indiana utility companies were invited to participate, including those not regulated by the Commission. In fact, on multiple occasions it was explicitly emphasized that the Billing Symposium was not intended in any way to create rules, mandates, or additional policies regarding utility billing in Indiana. It was also not a forum to discuss current policy disagreements between utilities and consumer groups. It was to be a forum to better understand billing practices and consumers’ needs and opinions from multiple perspectives.

Because the nature of the project took a very different approach from other IURC initiatives with stakeholders who do not typically interact in this type of forum, Ms. Mosley met with more than 40 stakeholders at least one time in a one-on-one atmosphere to explain the purpose of the Symposium and to get initial feedback and concerns before the first “Kickoff Meeting.” The stakeholders included representatives from:

- Regulated utilities;
- Unregulated utilities;
- Consumer advocacy groups that interact with the IURC in regulatory proceedings;
- Consumer advocacy groups that do not interact with the IURC but do interface with consumers who are affected by utility billing issues;
- National and state associations; and,
- Other Indiana state agencies.

A Kickoff Meeting to explain the purpose of the Symposium and initiate the research-gathering process was held on September 3, 2015, in Indianapolis, Indiana, with all stakeholders present. After the first half of the Kickoff Meeting, both groups of the stakeholders (utilities and consumer groups) met with Commission staff separately to develop questions for the other group. The Commission wanted the groups to drive the topics and questions of the Billing Symposium to ensure it would be valuable for all stakeholders. The Commission found that this approach, along with the one-on-one meetings, led to more engagement from both sides and continued to emphasize the point that the IURC was serving as a facilitator and wanted only to learn more about billing best practices with no intention of making any changes to Indiana rules, regulations, or policies regarding utility billing.

During and after the Kickoff Meeting, consumer groups and utility companies developed a body of questions for each other that would help foster mutual understanding of different stakeholder group goals and challenges. These questions related to consumer preferences for billing delivery, billing design, and utility company practices, among other topics. All questions were sent to groups to answer.

The Commission offered all stakeholders assistance with inputting their survey questions into the agency’s SurveyMonkey® tool. Three consumer groups (Citizens Action Coalition, Indiana Office of Utility Consumer Counselor, and NAACP) used SurveyMonkey for the
project. Although the Commission assisted in setting up the survey tool, the survey questions and the summary of responses were completed by each group and not the IURC. These surveys were sent to customers using a variety of channels including emails, paper surveys, and focus groups. Surveys were composed of multiple-choice, interval scale, and open-ended questions. No effort was made to ensure that the individuals surveyed by the consumer groups would be a representative sample of the larger population of utility consumers. In the field of survey research, this kind of unstructured sampling is called by a variety of names, including accidental, convenience, opportunity, or even grab sampling: It is possible or even likely that the survey results reported are reflecting some kinds of self-selection bias on the part of those answering the questions, compared to what might be found using a more structured sampling technique. In this case, each group’s survey was sent to that group’s membership and was open to the public. Although there may be overlap of survey participation between groups and their surveys were not completed in a way that could be understood to fully represent the general population, each consumer group’s analysis provided valuable qualitative data that was instrumental in furthering the dialogue and purpose of the Symposium.

Utility companies answered questions provided to them from the consumer groups, which mainly focused on – among other topics – explaining the mechanisms and techniques the utilities use for designing bills; their research methods that have been completed, along with their key findings; billing communication outreach efforts; bill examples; and utility costs associated with making changes to bills. All participating stakeholders submitted their answers to the questions from the other corresponding group before the day of the Billing Symposium. These submissions can be found in Appendices C and D.

After much preparation, the Billing Symposium was held on November 2, 2015, in Indianapolis, Indiana, where NRRI facilitated four discussion panels. Subsequently, this report was produced by NRRI staff in March 2016, and it is being released concurrently with an independent NRRI research report about utility billing and customer communications.

3 Symposium Structure

The Billing Symposium was organized into four topical panels over the course of a one-day meeting, with each panelist providing up to a 10-minute presentation on the relevant topic. The panelists represented jurisdictional utilities, non-jurisdictional utilities, community entities, and government agencies, to best provide comprehensive insight into each topic. The Commission structured panels so that each would provide diverse viewpoints. NRRI staff members Rajnish Barua and Tom Stanton acted as neutral, third-party moderators for Symposium panels as a means of ensuring that proceedings reflected the neutral approach adopted by the IURC. Symposium panels covered the following billing-related issues:

1. Consumer Research;
2. Paper Billing;
3. eBilling; and,
Each panel included four or five presenters, who provided information from their organization on the panel topic, followed by 10-20 minutes of question-and-answer style discussion where the commissioners, audience members, panelists, and moderators had the opportunity to pose questions to the panelists (for the Billing Symposium agenda, see Appendix A). Although panelists provided substantial information within their allotted time, they did not always have time to present the complete information and the panelists’ PowerPoint presentations are included in Appendix B.3

4 Participants

Due to space limitations in the facility used for the Billing Symposium, participants included only stakeholders invited by the IURC who participated in the questionnaires or had a direct professional relationship and experience with the topic of utility billing issues. The following organizations were represented at the Billing Symposium:

**Government Agencies**
- Indiana Office of Utility Consumer Counselor (OUCC)
- Indiana Utility Regulatory Commission (IURC)

**Jurisdictional Utilities**
- AES Corporation/Indianapolis Power & Light (IPL)
- American Electric Power (AEP)/Indiana Michigan Power
- Aqua Indiana
- Citizens Energy Group (CEG)
- Duke Energy Indiana
- Indiana American Water (IAW)
- Jackson County Water
- Northern Indiana Public Service Company (NIPSCO)
- Vectren

**Non-Jurisdictional Utilities**
- Columbus Utilities
- Hendricks Power Cooperative
- Indiana Municipal Power Agency
- NineStar Connect
- Richmond Power & Light

**Other Entities**
- AARP
- Alliance of Indiana Rural Water

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3 Not all panelists used PowerPoint presentations; some referred to parts of their respective submissions found in Appendix C or Appendix D.
Citizens Action Coalition (CAC)
Indiana Association of Cities and Towns
Indiana Electric Cooperatives
Indiana Energy Association
Indiana Industrial Energy Consumers, Inc. (INDIEC), represented by Lewis-Kappes.
NAACP

5 Consumer Research Panel

The Consumer Research Panel focused on resources and methodologies used by utilities and consumer groups when researching what consumers want most on their utility bills. The panelists for the Consumer Research Panel were representatives of the NAACP, Citizens Energy Group, Indiana American Water, the Indiana Office of Utility Consumer Counselor, and Northern Indiana Public Service Company.

5.1 NAACP

The NAACP reached out to utility customers via email, social media, focus groups, and face-to-face communications. Fifty-five people provided feedback to the NAACP’s questions. Ninety-one percent of respondents reported holding a bachelor’s degree or higher, and 79 percent of respondents reported being 50 years or older. Due to limitations on time and resources, the survey respondents represent a convenient sample of NAACP members.

The NAACP panelist expressed the desire of respondents to receive billing information from utilities in a clear presentation. People responding to the NAACP’s survey value clarity in all parts of the bill from presentation to content. Respondents want to know the exact amount due on each bill, and 53 percent request a clearer due date. Respondents expressed a general interest for a larger font size. People surveyed want information to be clearly displayed to show whether bills are based on estimated or actual meter readings. The NAACP survey findings showed respondents’ desire to act as informed customers. Interest in information is demonstrated in the respondents’ stated preference for usage graphs (50 percent) and a 68 percent preference for a line-item format of billing charges. NAACP respondents expressed a desire for more information about customer usage on current bills and information about methods for lowering future bills. Consistent throughout the NAACP’s responses is the idea that a well-formatted bill design that displays important information clearly will help customers understand the justifications for high bills and could lead to improved payment outcomes.

Survey respondents also want more information to be provided on bills about available bill payment options and payment locations.

Survey responses indicate a general wariness toward electronic billing (partly attributable, the NAACP panelist believes, to the large number of respondents age 50 or older). This
wariness reportedly stems from security concerns associated with online billing and a fear that a bill might be overlooked without the physical reminder of a mailed bill.

Due to time constraints, the NAACP panelist did not have the opportunity to present all recommendations, but the NAACP’s presentation includes recommended on-bill financing for residential energy efficiency improvements as one possible method for alleviating cost burdens (see Appendix C). On-bill financing is a collection mechanism by which efficiency improvements are repaid by a utility customer through a series of payments, with the charges presented on the customer’s monthly bill. On-bill financing typically provides for improvements to be completed with terms including no money down and monthly payments designed to be less than monthly utility bill cost savings.4

5.2 Citizens Energy Group

The Citizens Energy Group (CEG) panelist presented information about customer demographics, survey methods, and key findings from a recent CEG customer survey. Ease of locating information on bills is important to customers. The clarity of the information provided is also a vital element for customer satisfaction. Finally, customers are concerned about whether they are receiving a sufficient amount of information on customer bills to make informed choices about usage patterns.

5.3 Indiana American Water

Indiana American Water (IAW) conducts ongoing customer research in the form of customer surveys, quarterly reviews, and ongoing billing review for ease of understanding. IAW entered into the process of revising its bills in 2013 based on feedback from customer surveys, call center staff interviews, and dispute resolution staff input. IAW receives the highest volume of complaints related to: (a) high bills; (b) customer does not understand bill; (c) bills contain corrections from earlier bills; (d) rate changes; and (e) requested bill adjustments due to water leaks that have been subsequently repaired.

As a result of this input, IAW has introduced the following changes: (a) bills are now printed in color (for the first time); and (b) a bold font is used to draw attention to important information (such as due date, amount due, and outcomes for late payments). The new bill format allows for multipage statements of up to four pages, and with the extra space available, IAW now has the ability to provide additional information about cancelled bills and re-bills.

IAW is taking other steps to improve customer communication experiences as well. In response to the high volume of complaints about rate changes, IAW is working to develop better ways of informing customers before rate changes take effect. IAW also has developed a new method for sharing information with customers that takes into account which types of

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information specific customers want to receive and their preferred medium of communication.

5.4 Indiana Office of Utility Consumer Counselor

The Indiana Office of Utility Consumer Counselor (OUCC) presented several key themes related to consumer preferences based on the consumer feedback gathered from the questions the OUCC sent out before the Billing Symposium.

The first finding was that estimated bills are unpopular. This issue received high-intensity negative responses, indicating general dislike.

The second finding was that billing inserts are not regarded in a positive light, although some customers report that they do read billing inserts at least some of the time. The OUCC panelist suggested that inserts are a potential area for improvement: customers come in contact with them regularly and they provide a potential method for delivering educational information to consumers if the content is interesting and the design is eye-catching.

The third finding the OUCC panelist presented was that language should be simplified on bills. Billing can be a complex undertaking, and the use of acronyms and technical jargon make it more so. The OUCC suggests finding creative ways to explain issues plainly on the bills to improve customer comprehension and experience. Similar to the NAACP, the OUCC’s results were produced using a convenience sampling of the population.

The fourth finding was that respondents’ desire for plain language does not reflect a desire for less information. The OUCC notes here that only eight percent of respondents indicated that they thought utility bills had too much information.

The fifth finding was that the type of information consumers want varies widely. This is well represented by the issue of font size: while customers want a larger font size, there is no agreement on the exact size.

The sixth finding was that paper billing is not going away any time soon and customer concerns are shaped by a number of consumer experiences. Not all customers have ready access to either a computer or high-speed Internet service, meaning eBilling options might be inaccessible for some customers.

Finally, the OUCC’s respondents reported feeling unprepared for changes to their monthly bills and expressed a clear preference for being notified in advance about changes in rates. Rate changes affect household budgets, so it is important to provide customers with adequate advance notice by using communications media that will catch customers’ attention.
5.5 Northern Indiana Public Service Company

In 2013, Northern Indiana Public Service Company (NISPCO) began to research and develop a new bill design with the purpose of designing a version of its bill they hope to make available to customers this year. The last bill redesign was introduced to customers in 2006. The objective of NIPSCO’s current redesign, which is based on direct customer feedback, is to make bills easier to read and more understandable, so that customers can quickly find the information they need. Specifically, NIPSCO plans to simplify the presentation of information that matters most to customers and improve customers’ understanding of energy costs.

Using combinations of internal research, online customer surveys, and focus groups, NIPSCO has collected feedback about problems with its current bill format and ideas for improving its next bill design. Internal research was collected via a focus group from more than 60 cross-functional employees regarding NIPSCO’s bill compared to other utility and non-utility bills. NiSource, NIPSCO’s parent company, tested an initial prototype and surveyed customers about it. NiSource received 2,217 responses, of which 26.6 percent were from NIPSCO customers (NIPSCO is one of seven of NiSource’s energy distribution companies). The survey focused on understanding the information customers value most when reviewing their utility bills and explaining to the focus group how the prototype would compare to the current bill format. One notable method employed to gather information on customer use patterns in NIPSCO’s online survey was a mouse-driven marker feature that allowed panelists to highlight areas of importance on a prototype version of the bill. Finally, NIPSCO recruited 96 customers to participate in an in-person, facilitated focus group.

NIPSCO’s research on customer feedback revealed the following findings related to bill content and format: (a) a concise account summary section at the top of the bill was the most important desired feature; (b) customers prefer usage history to be presented on the front side of the bill; and (c) customers prefer a bar graph, instead of a line graph, for presenting their usage-history data.

5.6 Panel Discussion

During discussions following the presentation, Commissioner Huston inquired about survey methodology and the planning process that goes into decisions to redesign bills. Specifically, how do utilities ensure they receive feedback representative of different demographics, and how do utilities decide when to redesign bills? NIPSCO responded that they use different methods including telephone surveys. The planning process varies, but the general consensus from CEG and IAW was that the decision to redesign bills was driven primarily by customer feedback, complaints, and survey results.

When asked whether consumer groups had learned any information from utility groups that they found helpful, the NAACP representative responded in the positive, noting that it was clear that customer feedback is taken into account when utilities are making decisions. The
OUCC representative pointed to the varied preferences of customers especially in regards to issues like font size and what information should be included on bills.

IURC Chair Carol Stephan inquired about how customers were notified when eBilling was used. CEG said they used a third-party company to provide reminder information to customers. NIPSCO had a similar arrangement to CEG but specified that disconnect notifications are delivered only via paper. IAW uses letters for prior notice, and both door hangers and personal phone calls to warn customers prior to disconnection.

6 Paper Bills Panel

This panel focused on the format of utilities’ paper bills as well as methods to meet the diverse needs of customers through bills (simple and detailed) and customer expectations. The panelists for this session were NineStar Connect, Aqua Indiana, Citizens Action Coalition, Indiana Office of Utility Consumer Counselor, and Duke Energy.

6.1 NineStar Connect

NineStar Connect (NineStar) reported redesigning its electric bill in 2013 based on consumer feedback from their annual meeting, recommendations from its board of directors, and phone calls from customers. As part of the redesign, NineStar worked to clarify information about rate adjustment mechanisms (trackers) by using simplified language and including a comparison of previous month to current month energy consumption on bills. Because NineStar offers customers the opportunity to purchase a solar panel from a community shared solar farm, information on solar production and any running credit amount can also be included on the bill. Customers participating in NineStar’s Time-of-Use (TOU) rate are provided with on-peak and off-peak kilowatt hour consumption for the month, along with a message on their bill notifying them about how much money they have saved by participating in the program.

6.2 Aqua Indiana

The Aqua Indiana (Aqua) panelist highlighted that customer perception of utility companies is based on customer interactions with companies through their bills and via contact with call centers. With the amount of diversity in customer interests, it can be challenging to provide customers with the experience they want. Aqua’s last bill redesign occurred in 2012.

Aqua attempts to provide customers with more detailed information through welcome packets, which are sent to all new customers. Welcome packets include information on understanding bills, definitions for common billing terms, different ways that customers can contact Aqua representatives, and information about the various payment options available to customers.
6.3 Citizens Action Coalition

The Citizens Action Coalition (CAC) recognizes the complexities of utility bill management due to the large volume of available information. The CAC panelist highlighted the changes over the past 15 years in the way consumers are messaging utilities when they are unhappy. These days, customers use Twitter, Facebook, and other types of social media to seek out information or express concerns. Even with changes in consumer communication channels, the monthly bill is still the primary gateway for utilities to communicate with consumers.

CAC customer feedback highlighted customers’ desire for information. Survey responses called for detailed bills that provide information on line items. The CAC panelist also pointed out that there is an emotional component to utility billing.

The CAC customer survey\(^5\) revealed that the majority of respondents who reported feeling like they were not receiving enough information had barriers to receiving information such as multiple calls, long calls, or repeat calls each month. For this reason, the CAC representative wanted to ensure that it was easy for customers to opt in to receive an itemized bill as a means of increasing the amount of information consumers receive. Billing inserts are one way utility companies can share information with customers, but the CAC survey indicated that insert readership is mixed and inserts are perceived as only sometimes being helpful.

6.4 Indiana Office of Utility Consumer Counselor

The Indiana Office of Utility Consumer Counselor’s (OUCC’s) customer survey\(^5\) found that the top five pieces of information customers want included on their bills are: (a) a clear notice of whether a bill is estimated versus actual; (b) line-item billing; (c) fixed costs; (d) taxes; and (e) bar charts showing current and historical consumption. Respondents want to be notified of changes to their bills via inserts, a separate mailing, or a message printed on the bill itself. The OUCC’s survey findings suggest that customers want detailed information about how their bills are calculated and what is included in the costs, as well as how their current bills compare to past months.

6.5 Duke Energy Indiana

Duke Energy Indiana (Duke) has the capability to share important messages with customers in a highlighted section of their paper bills and in an information message in a section at the bottom of bills. Duke provides customers with the option to receive condensed or detailed bills. Customers opt in to receiving condensed bills by checking a box that is returned with their payments. Duke reported that condensed bills were very popular: 87 percent of residential customers and 72 percent of nonresidential customers have chosen to receive condensed bills. Duke’s bills are printed in black and white and are also available in Braille and large-print versions. Duke customers who have opted into eBilling receive a PDF format.

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\(^5\) It is possible that some of the same individuals might have responded to the surveys conducted by multiple stakeholder groups.
of their printed bill. Duke provided cost estimates for making changes of different magnitudes to its existing bill, and these estimates are provided in Table 1.

### Table 1: Duke’s Reported Costs for Making Format Changes to Utility Bills

<table>
<thead>
<tr>
<th>Change</th>
<th>Description</th>
<th>Example</th>
<th>Process</th>
<th>Estimated Cost</th>
<th>Estimated Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>No Change</td>
<td>Updates to customer information</td>
<td>Simple bill messages or new trackers/riders</td>
<td>Limited testing required</td>
<td>$0</td>
<td>1 month</td>
</tr>
<tr>
<td>Small Changes</td>
<td>Minor formatting changes</td>
<td>Add/ remove phone number</td>
<td>Target test scenarios Approval built in to the process</td>
<td>$99,999</td>
<td>3 months</td>
</tr>
<tr>
<td>Medium Changes</td>
<td>Reworking a bill section</td>
<td>Add graphics in the middle of the bill</td>
<td>Test numerous scenarios Limited outside input and approval</td>
<td>$100,000 - $999,999</td>
<td>6-12 months</td>
</tr>
<tr>
<td>Large Changes</td>
<td>Reworking multiple bill sections</td>
<td>Major bill format overhaul</td>
<td>Gather customer feedback, design mock-ups, revise, and approve Test all scenarios Training/customer communication/prepare for problems</td>
<td>Over $1,000,000</td>
<td>12+ months</td>
</tr>
</tbody>
</table>


### 6.6 Panel Discussion

Participants were curious about which types of issues companies are engaging with customers via social media. Aqua reported using social media for customer relationship issues but it does not provide billing information through that medium. Duke Energy and NineStar reported using social media to communicate with customers about safety issues and storm planning, also noting that they could private message customers to help resolve billing issues if customers had reached out through social media.

Utility companies were asked which services they provide to address customer concerns about missed payments if customers have switched to eBilling. NineStar reported that they
send confirmations when payments have been applied but do not notify customers about missing payments until disconnect notices are sent. Duke responded that they provide customers with reoccurring payment options and eBilling on their website and that they notify customers via email when statements are ready. Aqua reported providing an automated payment system called ZipCheck for customers.

Regulated utility companies were asked how much of the cost for updating billing formats was already accounted for in the rate base and how much money would need to be requested separately. Panelists replied that the money for small and medium-sized issues is mostly built into the rate base, but there are “peaks and valleys” in the costs. One panelist emphasized that billing updates were resource-rich endeavors, and it would be costly for customer call centers if redesigns were poorly implemented.

7 eBilling Panel

The purpose of this panel was to invite discussion between consumer groups and utilities on the principle issues and concerns that might be associated with electronic billing (eBilling). Utilities asked consumer groups what could make eBilling more attractive to consumers and increase eBilling participation. The panelists for this session were NineStar Connect, AEP/Indiana Michigan Power, Indiana American Water, Citizens Action Coalition, and the Indiana Office of Utility Consumer Counselor.

7.1 NineStar Connect

NineStar Connect (NineStar) reported that approximately 10 percent of customers utilize SmartHub, their eBilling option. SmartHub is an online application for customers to review both their telephone and electric bills, and it provides detailed information on customer usage (including usage comparisons and detailed TOU data), along with billing and payment history information. SmartHub is available to all customers; access is not restricted to eBilling users.

7.2 American Electric Power/Indiana Michigan Power

American Electric Power (AEP)/Indiana Michigan Power reported that approximately 25 percent of its customers are currently using eBilling. AEP views paperless billing as an important part of customer engagement because it helps to keep operational costs lower by reducing mailing costs, saving paper, and providing customers with more choices. For these reasons, AEP provides eBilling to its customers free of charge. AEP’s Indiana eBilling customers rate their billing experience 12 percent higher than their paper bill counterparts. AEP presents eBilling customers with a summary of their bill, and customers have the option to click a link that sends them to a detailed version of the bill. AEP reports that only seven to nine percent of customers choose to view their detailed bill. For AEP’s eBilling customers and those who register online, AEP offers a variety of informational resources such as usage
comparisons, energy efficiency information, information on available programs, and access to a detailed bill.

One major adoption issue AEP has faced with eBilling is that some customers are concerned they might forget to pay their bills if they switch to paperless billing. In response to this concern, AEP has created a system to provide mobile alerts for payment reminders, as well as for outages. AEP also encourages customers to sign up for eBilling and mobile alerts, by offering them a chance to win a Microsoft Surface tablet computer.

7.3 Indiana American Water

Indiana American Water (IAW) reported that 32 percent of customers are currently enrolled in its self-service option, and 16 percent of customers use eBilling (with the caveat that customers have to sign up for self-service to use the eBilling system). Customer feedback has shown that customers do not like having to sign up for the self-service option to utilize eBilling, which IAW is working to change. eBilling customers receive notifications electronically.

The IAW panelist introduced the topic of push versus pull for sending information to customers. This concept refers to whether a company “pushes” the information to a consumer or “pulls” the consumer back to their website to view information. IAW currently uses a pull method (which they report costs 6 cents, compared to 11 cents for push), but reports that customers do not like being pulled back to the IAW website to view a PDF of their bill. IAW also is currently developing a notification program to let eBilling customers know when payments are due.

7.4 Citizens Action Coalition

The Citizens Action Coalition (CAC) reported that 20 percent of respondents use eBilling and that these customers are reporting satisfaction with the eBilling system ease of use. Additionally, 12 percent of respondents are currently signed up to receive both paper bills and eBilling. Cyber security was the major concern cited by respondents who are not using eBills. One respondent noted that they want to receive a paper bill and have the ability to pay online. While the CAC panelist recognized the positive aspects of eBilling, she also wanted to remind the Symposium participants of the accessibility issues many customers still experience because they do not own a computer or have Internet access. She further emphasized the importance of maintaining and continuing to improve paper-billing services.

7.5 Indiana Office of Utility Consumer Counselor

Nearly one-fifth (19%) of the Indiana Office of Utility Consumer Counselor (OUCC) respondents reported using eBilling exclusively, and a similar number reported receiving both eBills and paper bills. The survey responses highlighted customer interest in having flexible payment options. The responses showed a concern over potential fees associated with eBilling, and noted that there is a perception that utilities might want to charge fees to
customers using eBilling, even if eBilling costs the utility less than paper billing. Respondents also registered concerns over identity theft that could be associated with using eBilling, and the OUCC panelist recommended utilities work to educate consumers about the measures utilities have adopted to prevent identity theft.

When asked why respondents who had elected not to receive eBills had made this decision, there were several common answers. Respondents expressed concerns that they might lose their bill, forget to pay, or have private information stolen. Other responses for not switching to eBilling included being “old school,” being change averse, not having a computer, and not having access to high-speed Internet. Regardless of respondents’ preferences for paperless or eBilling, people want to see the same information on an eBill that they would see on a paper bill, and customers want to be notified of changes by a separate message, not included on the regular bill.

7.6 Panel Discussion

Utility companies were asked how they share information about the security of customer data with the customers. AEP and NineStar responded that their privacy policies are available on their websites and that they sometimes also respond via phone to customer inquiries about information privacy.

Participants asked whether all companies were seeing growth in the number of customers using eBilling. NineStar reported significant growth, especially in September and October of 2015. NineStar did not provide an explanation for the recent growth, though. IAW had seen similar growth and suggested that its policy to allow e-checks free of charge might have helped spur growth.

Panelists were asked why customers were requesting notifications in addition to their regular bills. The OUCC attributed this preference to the idea that more and separate notifications (not included with the bill) would decrease the likelihood of a customer missing important information.

8 Comprehensive Customer Engagement on Billing Panel

The panel discussion regarding customer engagement on billing covered methods for improved communications, bills, other useful communiqués, and customer education. The panelists for this session were Aqua Indiana, Vectren, Citizens Action Coalition, Indiana Office of Utility Consumer Counselor, and Hendricks Power Cooperative.

8.1 Aqua Indiana

The Aqua Indiana (Aqua) panelist began by recognizing that customers like building relationships with their utility companies, and Aqua works to develop these relationships in different ways. For this reason, Aqua’s state president fields calls directly from customers.
Aqua has developed a customer webpage where customers can learn more about their bill if they set up an account. Aqua also connects with its customers by maintaining an active presence on social media outlets such as Twitter. Aqua conducts customer surveys regularly, but because these surveys are targeted to people who have already interacted with the call centers, Aqua is aware that the surveys do not reach all customers.

Aqua has three call centers throughout the United States. After receiving customer feedback that customers prefer to talk to local people when calling, Aqua now routes all incoming calls to the caller’s closest call center. Aqua reports it is currently working on improving customer communications through billing inserts by making these communications “eye-catching, colorful, and innovative.”

8.2 Vectren

Vectren works to provide information to customers by including billing definitions on the back side of all bill pages and making billing definitions available on its website. During Vectren’s recent billing redesign process, the company informed customers of upcoming changes and the purpose of these changes through billing inserts and on their website.

The Vectren panelist emphasized the ways in which Vectren is engaging in “forward-thinking, multichannel” communications. New software allows Vectren to include “onserts” (customer-specific billing messages) on bills, which Vectren can use to alert customers of bill changes. Vectren has taken a proactive approach to communicating with customers about projects that can increase bills by telling the story as it occurs and coordinating those communications with relevant city and local groups. This might apply, for example, to infrastructure improvements in particular neighborhoods. Finally, Vectren uses door-to-door notifications to reach out to impacted customers.

8.3 Citizens Action Coalition

The Citizens Action Coalition’s (CAC’s) customer survey indicated a general sense of distrust toward utilities concerning billing communications. The survey identified several reasons for this attitude. One respondent said that “utilities are providing far too much promotional material instead of critical information about my bill.” Other customer feedback included concerns about rate increases, aversion to change, and expectations that outcomes would not be positive when dealing with utilities.

Customers expressed an interest in using information to the best of their abilities and reported that the helpfulness of billing inserts varied from month to month.

8.4 Indiana Office of Utility Consumer Counselor

The Indiana Office of Utility Consumer Counselor (OUCC) panelist recognized that the communication landscape had changed drastically over a short period of time with advancements in technology and the growth of social media outlets such as Facebook,
Twitter, and LinkedIn. Even so, when asked what would make it easier to understand utility bills, customers’ most popular answer was billing inserts. The customer survey revealed many people’s desire for utility companies to use inserts more efficiently by including fewer advertisements, less information on non-related topics, and more information about bills. The OUCC panelist viewed billing inserts as an opportunity to address customers’ desire for more information by using the available space to provide educational information each month on billing-related topics.

8.5 Hendricks Power Cooperative

Although only 17 percent of Hendricks Power Cooperative’s (HPC) customers use eBilling, 60 percent pay using electronic methods. HPC provides energy usage information to customers through an online portal that has customer usage history data available by year, month, day, and hour. The HPC panelist highlighted the usefulness of hourly data, which can help customers understand their own usage patterns. HPC also provides customers with a prepaid metering option that lets them pay for their energy in advance. The HPC panelist reported that the prepaid program enables customers to track energy usage daily and also helps the co-op avoid unpaid bills.

8.6 Panel Discussion

Panelists were asked whether customer communications ever focus on providing more information, as survey feedback had been critical of advertisements. Vectren responded that the company focused a media campaign on budget billing a few years ago when bills were forecasted to increase 20 percent in the upcoming year, but also recognized that Vectren had not run a similar campaign more recently. Vectren and HPC both provide a notification on customer bills about where customers can find more information. HPC reported that the company sends its customers letters with additional information, separate from billing inserts, and customers have responded positively to this approach.

Utility groups were asked whether they provide the same level of information in paper form as they provide online and whether there had been efforts to encourage marginalized groups to utilize information-rich online resources. Vectren responded that customer communication is a multichannel effort, stating that the company’s target demographic is “18 to dead,” meaning all customers. Vectren emphasized the importance of repetition in sharing information with customers, which they accomplish by using multiple different types of media channels.

Utility groups were asked whether they collect data that could help them understand which channels of communication reach different demographics. HPC reported collecting most of its user data from electronic channels and emphasized that it still focuses on disseminating information through many channels. IPL recognized the shift towards digital communication but said that it has circled back around to relying more on face-to-face communication. IPL also said that it is now trying to use social media as a mechanism for developing more face-to-face interactions with customers. A utility representative in the audience said that when
sharing new information, that company tries first to use customer interviews, if possible, and brings experts along to provide detailed information that customers might need.

9 Summary

9.1 Common Themes

Throughout the Symposium discussions, there were both overlaps and areas of divergence in the topics customer groups and utilities recognized as important. Consumer groups focused on customers’ desire for important information such as the amount due and due dates to be prominently displayed on bills. They also expressed a strong preference for line-item billing, use of clear language, and the inclusion of definitions on bills.

Consumer groups noted customers’ concerns about forgetting to pay utility bills when signed up for eBilling, and utility companies talked about new methods, some already in use and others being developed, that would increase communication between customers and companies about outages, emergencies, and billing reminders. There were similar convergences on issues—such as the importance of effective billing design (balancing content with presentation), providing more information to customers, and communicating changes—where utility panelists recognized consumer preferences and had already implemented or were presently working to improve service offerings.

Utility companies reported providing more detailed information in the welcome packets sent to new customers, on their websites, and through customer call centers. Based on customer concerns about accessibility issues relating to computers or the Internet and the expressed frustration about the time investment necessary to resolve issues when contacting a customer call center, the welcome packet represents one potential method of proactively sharing information with customers before problems occur.

Billing inserts were mentioned by both the CAC and OUCC. Although the number of customers who reported reading their billing inserts was mixed at best, the OUCC identified billing inserts as a potential opportunity for utilities to provide customers with additional information about upcoming changes. Toward the goal of providing customers with more information when changes occur, Duke, NineStar, and Vectren reported that they had created space on their bills to share messages with customers.

The issue of condensed versus detailed bills was a common theme addressed in the Paper Billing Panel. Although both the CAC and the OUCC survey findings from their convenience sampling of their interest groups and the public showed that consumers wanted more information to be provided on bills, Duke reported 87 percent of residential customers participate in its optional, condensed billing program. This contrast between expressed wants versus actual behavior is worthy of consideration: It highlights the kind of divergence that is often found between expressed consumer preferences and actual consumer behavior.
Both AEP and the CAC reported that customers using eBilling describe the experience as positive. However, there appears to be a disconnect between customer groups and utility companies about what the eBilling concerns are and how companies are addressing these issues. Both the OUCC and CAC reported customer concerns over potential fees associated with eBilling as well as cybersecurity concerns.

Another common theme throughout the Symposium was the relationships between utility online portals, customers receiving bills electronically, and customers paying bills online. IAW requires customers to sign up for its self-service website before allowing customers to sign up for eBilling; this requirement has received customer complaints. However, the CAC reported that customers are not so much interested in receiving eBills but do want the ability to pay online. Customers have shown a preference for using online billing services that do not require them to take additional steps such as signing up for online portals. Efforts by utilities to simplify the sign-up process could be one way to improve user experience.

Throughout the Comprehensive Customer Engagement on Billing Panel, there was an emphasis on multichannel communication, which complemented insight from earlier panels about the diversity of customer preferences. Although utilities were excited about developing capabilities to provide customer-specific messaging on customers’ bills, customer feedback expressed an interest in receiving separate, off-bill communications about important information and upcoming changes. Aqua’s effort to improve the attractiveness and content of its billing inserts appears to be one promising approach, given the OUCC’s recommendation that utilities can make better use of billing inserts to provide educational information about bills. HPC takes customer outreach a step further by sending individual letters.

9.2 Billing Symposium Follow-up Survey

At the conclusion of the Billing Symposium, the IURC asked Symposium participants to complete a survey that was included in their information packet. A follow-up email with a link to the same survey online was also sent to participants. The survey consisted of eight questions. Of the 58 attendees, 32 completed and returned surveys. Of the 32 survey respondents, 5 were associated with consumer groups, 19 represented utility companies, and 8 responded as “other.” Of the same 32 respondents, 26 respondents (81%) either “strongly agreed” or “agreed” that the Billing Symposium was a valuable experience. Of these 26 respondents, five were from the consumer groups and 15 were from the utilities. In a follow-up question, 23 respondents (72%) indicated they would attend a similar forum in the future.

In response to another question, 27 respondents (84%) “strongly agreed” or “agreed” that their views were respectfully considered.

When asked which aspect of the Symposium respondents found most useful, the four most common responses were, in order: (1) hearing what consumers want; (2) the variety of panelists/viewpoints represented; (3) learning about others’ best practices; and (4) information from the surveys/data collection.
Direct quotes from the survey responses that provided the IURC with some insight as to how some participants viewed the Billing Symposium included:

- “Very informational. I got the type of info that takes 2-3 days at a conference to get. Thanks!”
- “Overall very good. I enjoyed it and got useful info to take back and share.”
- “The packets, including dummy bills from all participating utilities, were helpful. I also liked how the panels included a broad spectrum of speakers from the various utilities.”

When asked which aspects of the Symposium respondents found least useful, 16 respondents either did not answer the question, or reported “nothing.” Of the 16 who did answer, responses were varied: For example, answers included, “The panels needed a more specific focus”; “The Symposium needed to be shorter”; and other miscellaneous issues.

Finally, respondents provided the following feedback when asked what specific improvements could make a future forum better: greater variety of panelists (22%), better venue (13%), and breakout sessions for specific issues (9%).

### 9.3 Conclusion

In summary, this Billing Symposium was a valuable forum for information-sharing and learning among the many participating Indiana utility stakeholders, providing a natural jumping-off point for future conversations. Many interactions regarding regulatory commission activities take place in contested-case hearings which often engender particular kinds of communications, with each group taking its own particular stance on issues and precious little opportunity for open dialogue and discussion. Thus, although initiating such opportunities can be challenging, seeking out these kinds of opportunities for open communications can prove valuable for all interested parties. Time will tell, but adopting this approach for the particular topic of billing and customer care communications could well have sown the seeds for additional positive conversations on this and other topics.

Based on information gleaned from this Symposium and additional data from other state commissions around the country, the authors simultaneously prepared a research report⁶ that takes a broader look at the issues of utility billing and related customer communications.

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Appendix A:
Symposium Information Packet
(29 pages)
November 2, 2015

Dear Billing Symposium Participant:

Thank you for attending the Indiana Utility Regulatory Commission’s (Commission’s) Billing Symposium. As you know, we are here to understand and learn from each other about billing practices and transparency of bills across the utility industry. This symposium is a one-of-a-kind event for the Commission, Indiana, and, very likely, the nation. We truly appreciate your active involvement in the development of the symposium and your participation today.

Because we are encouraging an open dialogue and in order to maintain an open atmosphere of cooperation and a sharing of thoughtful ideas, the Commission respectfully asks that each attendee and panelist keep in mind the following general rules:

- This is not a policy discussion.
- Actively listen to others.
- Every idea and opinion deserves to be heard.
- The goal is not to agree, but to gain a deeper understanding.
- It’s okay to agree to disagree, just express your opinion constructively.
- Please stay on topic.
- This is not a forum to pick on utilities or consumer groups; while examples may be used, please be respectful of each other’s company or organization.

The packets you have received should contain all the necessary items for today’s event. The Commission also respectfully asks that each attendee fill out the survey found in your packet for today’s symposium. This survey is vitally important for evaluation of the Billing Symposium and will be used as a learning tool. The survey is confidential, and you may simply drop off the survey at the registration table at the end of the day.

Again, thank you for attending and being a part of this important discussion.

Sincerely,

Jim Huston
Commissioner
Indiana Utility Regulatory Commission
Indiana Utility Regulatory Commission Billing Symposium

Monday, November 2, 2015; 9:00 a.m. - 4:00 p.m.
Rice Auditorium-ISDH (Lower Level) - 2 North Meridian Street, Indianapolis, IN

Attendees:

AARP
- Bill Malcolm – Staffer

AEP/Indiana Michigan Power
- Brian Bergsma – Director, Corporate Communications & Governmental Affairs
- Kathleen Kelley – eServices and Customer Channel Management
- Marc Lewis – Vice President, Regulatory & External Affairs
- Randall Miller – AES Support

Alliance of Indiana Rural Water
- Connie Stevens – Executive Director

Aqua Indiana
- Tom Bruns – President
- Bobby Estep – Director of Accounting

Citizens Action Coalition (CAC)
- Kerwin Olson – Executive Director
- Lindsay Shipp – Organizer

Citizens Energy Group
- Jeff Ford – Director of Procurement
- Sarah Holsapple – Media Relations Coordinator
- Joe Sutherland – Director, Government and External Affairs

Columbus Utilities
- Connie Armstrong – Accountant
- Melissa Chadd – Billing Clerk

Duke
- Stan Pinegar – Vice President, Government Affairs
- Melanie Price – Associate General Counsel
- Kevin Wald – Manager

Hendricks Power Co-operative
- Greg Ternet – Chief Executive Officer

Indiana American Water
- Kari Leck – Business Process Supervisor
- Joe Loughmiller – Manager, External Affairs
- Tammy MaLaughlin – Manager, Business Support Services
- Peg Richardson – Operations Specialist

Indiana Association of Cities and Towns
- Rhonda Cook – Deputy Director, Chief Federal and State Policy Officer

Indiana Electric Cooperatives
- Scott Bowers – Vice President, Government Relations
- Brian Christenberry – Manager, State Government Relations

Indiana Energy Association
- Mark Maassel – President
- Tim Rushenberg – Vice President

Indiana Municipal Power Agency
- Carolyn Wright – Vice President, Government Relations

Indianapolis Power & Light
- Brandi Davis-Handy – Director, External Communication
- Fred Mills – Director, Government Affairs
- David Farris – Manager, Customer Billing, Credit, and Collections

Jackson County Water
- Larry McIntosh – Director; IRWA Board President

Lewis Kappes
- Kay Squires – Paralegal (INDIEC Representative)

NAACP
- Denise Abdul-Rahman – Environmental Climate Justice Chair
- Cordelia Lewis-Burkes – Member
- David Greene – Member

National Regulatory Research Institute
- Rajnish Barua – Executive Director
- Kathryn Kline – Research Assistant
- Tom Stanton – Principal Researcher (Energy and Environment)

NineStar Connect
- Regina Bever – Director, Customer Service

NIPSCO
- Cindy Jackson – Manager, Energy Efficiency and Assistance Programs
- Debora Owen – Executive Director, Customer Service
- Kathleen Szot – Public Relations and Communications
- Ron Uzubell – Director, Customer Transactions
Indiana Utility Regulatory Commission Billing Symposium

Office of Utility Consumer Counselor (OUCC)
- Karol Krohn – Deputy Consumer Counselor
- Brad Lorton – Utility Analyst
- Anthony Swinger – Director, Public Information Officer

Richmond Power & Light
- Amy Burris – Customer Service Manager

Vectren
- Natalie Hedde – Director, Corporate Communications
- Chase Kelley – Vice President, VUHI - Marketing and Communications
- Mike Roeder – Vice President, Government Affairs; President, Vectren Energy Delivery North

Indiana Utility Regulatory Commission (IURC)
- Carol Stephan – Commission Chair
- Jim Huston – Commissioner
- Chetrice Mosley – Executive Director, External Affairs
- Beth Roads – General Counsel
- Kenya McMillin – Director, Consumer Affairs
- Megan Wade-Taxter – Public Relations Manager
- Ryan Hadley – Policy Analyst
- Lisa Shoemake – Senior Analyst, Consumer Affairs
- Erin Certolic – Analyst, Consumer Affairs
- Megan Eli – Analyst, Consumer Affairs
- Robin Lane – Analyst, Consumer Affairs
- Sarry McPherson – Intake, Consumer Affairs
- Makenly Myers – Public Relations Intern

Agenda:

9:00 Welcome and Opening Remarks by Commission Chair Carol Stephan and Commissioner James Huston

9:15 – 10:15 Consumer Research Panel
Denise Abdul-Rahman – NAACP
Jeff Ford – Citizens Energy Group
Joe Loughmiller – Indiana American Water
Anthony Swinger – OUCC
Ron Uzubell – NIPSCO

10:15 – 10:30 Break
Indiana Utility Regulatory Commission Billing Symposium

10:30 – 11:30  Paper Billing Panel
Regina Bever – NineStar Connect
Tom Bruns – Aqua Indiana
Lindsay Shipps – CAC
Anthony Swinger – OUCC
Kevin Waid – Duke

11:30  Lunch & NRRI presents preliminary results of national research

1:30 – 2:30  eBilling Panel
Regina Bever – NineStar Connect
Kathleen Kelley – AEP/Indiana Michigan Power
Tammy MacLaughlin – Indiana American Water
Lindsay Shipps – CAC
Anthony Swinger – OUCC

2:30 – 2:45  Break

2:45 – 3:45  Comprehensive Customer Engagement on Billing Panel
Tom Bruns – Aqua Indiana
Chase Kelley – Vectren
Lindsay Shipps – CAC
Anthony Swinger – OUCC
Greg Ternet – Hendricks Power Cooperative

3:45 – 4:00  Closing Remarks by Commissioner James Huston

Meeting participants’ pending cases before the IURC:

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|                           | 43955 | DSM        |
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## Indiana Utility Regulatory Commission Billing Symposium

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**Lewis Kappes**

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Commission Billing Statistics

Introduction
The Indiana Utility Regulatory Commission’s (Commission) Consumer Affairs Division (Consumer Affairs) provide dispute resolution services through reasonable and timely determinations for customers of jurisdictional utilities, in accordance with Indiana Code, Indiana Administrative Code, and Commission-approved tariffs. The types of issues handled by Consumer Affairs includes extension of service and credits, deposits, billing, termination of service, customer rights, and utility responsibilities. This fact sheet is a compilation of the statistics Consumer Affairs has gathered over the past three fiscal years regarding billing issues: 2013, 2014, and 2015.

Terms & Definitions
The Commission’s Consumer Affairs has designated certain terms to code and categorize received complaints into their system. The terms are defined as follows:

- **Billing Dispute**: A category in Consumer Affairs’ system that relates to any issue involving a customer’s bill. The only time this code is not used for a billing dispute is for complaints with telecommunications (exception for slamming and cramming), videos, or other nonjurisdictional calls.
- **Deposit**: Related to a security deposit billed by a utility company for new or existing service. A complaint is coded as a deposit issue if the consumer is complaining about the deposit request, amount of the deposit, deposit refunds, payment arrangements, and disputes over creditworthiness.
- **Estimate**: Related to a situation where the customer is billed using a calculation determined by average usage. Estimation is a method of billing in which the utility uses historical or subsequent readings as a means for billing a customer.
- **High Bill**: Situations where the customer indicated they received a high bill from the utility. High bills could be the result of, but not limited to, adjusted billing, previous balances, high consumption, rate increases, and trackers.
- **Rates**: Complaints dealing with or disputing the utility’s rates.
- **Service Charge**: Customer complaints about flat charges on the bill or other charges that are not related to actual usage.
- **Submetering**: Complaints by customers being billed by a landlord, property manager, or third-party billing company for utility services. The customer is NOT being billed by a utility company.
- **Unpaid Bill**: Related to customers being billed for a previously unpaid bill, such as an old bill from another address.
Fiscal Year 2013
Consumer Affairs logged 4,127 complaints. Of the 4,127 complaints, 733 (18%) of the complaints were regarding billing disputes over jurisdictional issues. Out of 733 billing disputes, 43% were complaints against electric utilities, 19% against natural gas utilities, 9% against telecommunications, 27% against water utilities, and 2% percent against wastewater utilities.

The top five billing issues for FY 2013 were:
1. High Bill (36%)
2. Service Charge (8%)
3. Unpaid Bill (8%)
4. Deposit (7%)
5. Submetering (7%)

Fiscal Year 2014
Consumer Affairs logged 4,254 complaints with 883 (21%) entered as billing disputes over issues within the purview of the Commission. Of these complaints, 42% were filed against electric utilities, 23% were filed against natural gas utilities, 3% against telecommunications, 28% against water utilities, and 4% against wastewater utilities.

The top five billing issues for FY 2014 were:
1. High Bill (36%)
2. Submetering (11%)
3. Unpaid Bill (7%)
4. Rates (7%)
5. Estimate (6%)

Fiscal Year 2015
Consumer Affairs logged a total of 4,854 complaints. Of those filed, 1,126 (23%) were filed as billing dispute complaints. Of these complaints, 38% were filed against electric utilities, 30% against natural gas utilities, 1% against telecommunications, 27% against water utilities, and 4% against wastewater utilities.

The top five billing issues for FY 2015 were:
1. High Bill (42%)
2. Submetering (11%)
3. Deposit (8%)
4. Unpaid Bill (6%)
5. Service Charge (5%)
Company/Organization Biographies of Panelists

Aqua Indiana is a subsidiary of Aqua America, Inc. (NYSE: WTR), making it the second largest U.S.-based, publicly-traded water utility in the nation, serving more than 2.5 million residents in 8 states. This connection to a nationally based company has enhanced Aqua’s capabilities in all aspects of the water and wastewater business in Indiana. As we continue to grow our presence in Indiana, we will leverage the experience of Aqua America while still providing excellence in water and wastewater service throughout Indiana.

Citizens Action Coalition (CAC) is a 501(c)4 not-for-profit organization that was founded in 1974 by a group of community organizations, churches, labor unions, and senior groups. CAC’S mission statement is to initiate, facilitate and coordinate citizen action directed to improving the quality of life of all inhabitants of the State of Indiana through principled advocacy of public policies to preserve democracy, conserve natural resources, protect the environment, and provide affordable access to essential human services. In order to achieve the objectives, CAC’s activities include performing research, carrying out public education campaigns, organizing citizens, creating public awareness, lobbying legislators, intervening in utility cases before the Indiana Utility Regulatory Commission, and litigating when necessary.

Citizens Energy Group is a Public Charitable Trust providing safe and reliable water, wastewater, natural gas and thermal energy services to about 800,000 people and thousands of businesses in the Indianapolis area. The Trust means its utilities are managed only for the benefit of customers and the community.

Duke Energy Indiana is the largest electric utility in Indiana serving approximately 810,000 customers located in 69 counties in the central, north central and southern parts of the State of Indiana. The company has approximately 2500 employees, a total capacity of 7500 MW at its 14 power generation sites and more than 32,600 miles of transmission and distribution lines. Duke Energy Indiana also sells electric energy for resale to municipal utilities, Wabash Valley Power Association, Inc., Indiana Municipal Power Agency and to other public utilities that in turn supply electric utility service to numerous customers in areas not served directly by the company.

Hendricks Power Cooperative provides electricity and energy services to over 30,000 residential, commercial and industrial customers in west central Indiana; this includes portions of Hendricks, Morgan, Montgomery and Putnam counties. Formed in 1936, the cooperative is owned and controlled by members they serve. For more information regarding Hendricks Power Cooperative and other related service, please visit www.hendrickspower.com.
**Indiana American Water.** a wholly owned subsidiary of American Water (NYSF: AWK), is the largest investor-owned water utility in the state, providing high-quality and reliable water and/or wastewater services to more than 1.2 million people. Founded in 1866, American Water is the largest and most geographically diverse publicly traded U.S. water and wastewater utility company. With headquarters in Voorhees, N.J., the company employs 6,800 dedicated professionals who provide regulated and market-based drinking water, wastewater and other related services to an estimated 15 million people in 47 states and Ontario, Canada. More information can be found at [www.amwater.com](http://www.amwater.com).

**Indiana Michigan Power (I&M)** is headquartered in Fort Wayne, and its 2,450 employees serve more than 589,000 customers. It operates 2,600 MW of coal-fired generation in Indiana, 2,160 MW of nuclear generation in Michigan and 22 MW of hydro generation in both states. The company also provides its customers 450 MW of purchased wind generation and by the end of 2016 approximately 15 MW of utility-scale solar generation. American Electric Power is one of the largest electric utilities in the United States, delivering electricity to more than 5.3 million customers in 11 states. AEP ranks among the nation’s largest generators of electricity, owning nearly 32,000 megawatts of generating capacity in the U.S. AEP also owns the nation’s largest electricity transmission system, a 40,000-mile network that includes more 765-kilovolt extra-high voltage transmission lines than all other U.S. transmission systems combined. AEP’s transmission system directly or indirectly serves about 10 percent of the electricity demand in the Eastern Interconnection, the interconnected transmission system that covers 38 eastern and central U.S. states and eastern Canada, and approximately 11 percent of the electricity demand in ERCOT, the transmission system that covers much of Texas. AEP’s utility units operate as AEP Ohio, AEP Texas, Appalachian Power (in Virginia and West Virginia), AEP Appalachian Power (in Tennessee), Indiana Michigan Power, Kentucky Power, Public Service Company of Oklahoma, and Southwestern Electric Power Company (in Arkansas, Louisiana and east Texas). AEP’s headquarters are in Columbus, Ohio.

**The Indiana Office of Utility Consumer Counselor (OUCC)** represents the interests of residential, commercial and industrial utility customers in cases before the Indiana Utility Regulatory Commission (IURC), the Federal Energy Regulatory Commission (FERC), the Indiana Court of Appeals, and the Indiana Supreme Court. Our mission is to represent all Indiana consumers to ensure quality, reliable utility services at the most reasonable prices possible through dedicated advocacy, consumer education, and creative problem solving.
NAACP Indiana Environmental Climate Justice (ECJ)
(www.facebook.com/indiananaacpecj): Our mission is to influence and impact Indiana Environmental, Energy and Economic policies that will lead to cleaner energy, healthier environments and green economic opportunities for People of Color (POC) and People of Low Income (POL) and their community’s that typically live within the service area of coal-fired/fossil fuel power plants and are most negatively impacted by the energy decisions, such as, greenhouse gases (GHG) within the State of Indiana.

NineStar™ Connect: On January 1, 2011, Hancock Telecom and Central Indiana Power merged cooperatives into what is now known as NineStar™ Connect. It is only the second cooperative that has combined electric and communications services. The other being Nushagak Cooperative located in a remote part of Alaska. Although the founding of the original company can trace its beginnings back to 1895, NineStar Connect, has today emerged as a smart utility that delivers fiber optic connectivity and other utility infrastructure for homes and businesses that drive economic development and growth for communities. The communications division serves as a telecommunications cooperative that offers services like broadband Internet, telephone, video and security solutions. The electric services division provides electric power to customers in Hancock and parts of Hamilton, Madison and Rush counties. As of October 2015, NineStar Connect communications division has over 400 miles of fiber optic cable, 7,800 access lines, 7,100 broadband customers & 3,600 video customers. In addition, the power division of NineStar Connect approximately 14,000 meters and about 1,300 miles of energized line.

Northern Indiana Public Service Company (NIPSCO) has served the energy needs of Northern Indiana since 1912. Headquartered in Merrillville, NIPSCO is one of the seven energy distribution companies of NiSource Inc. (NYSE: NI). With more than 821,000 natural gas customers and 468,000 electric customers, NIPSCO is the largest natural gas distribution company, and the second-largest electric distribution company, in the state. NiSource distribution companies serve 3.8 million natural gas and electric customers primarily in seven states.

Vectren Corporation (NYSE: VVC) is an energy holding company headquartered in Evansville, Ind. Vectren’s energy delivery subsidiaries provide gas and/or electricity in adjoining service territories that cover nearly two-thirds of Indiana. Vectren Energy Delivery of Indiana - North delivers natural gas to approximately 574,000 natural gas customers in 48 counties in central and southeast Indiana. Vectren Energy Delivery of Indiana - South delivers natural gas to approximately 110,000 natural gas customers in 9 counties and 143,000 electric customers in 7 counties in southwest Indiana.
Consumer Group Questions for Utilities
(September 2015)

1. When determining what is on a bill (and how it is formatted), what research methods are used? What demographics are surveyed and/or included in focus groups?

2. Is there a difference in the consumer classes and how the bills are formatted and presented to them?

3. Can "dummy" copies of each type of your customer bills be provided?

4. Is there a billing template or standard vendor used by REMCs or municipals?

5. Why does it cost so much to change the format of a utility bill, or the information on the bill?

6. What do you provide when a consumer asks for a detailed bill?

7. What process does a customer use to get a detailed bill? Does this process differ when it is an electronic bill?

8. What portion of your retail customer base has requested electronic billing over the last three years?

9. What portion of your retail customer base has requested detailed billing over the last three years?

10. How do you educate your customers on the various ways to pay their bills, especially if the consumer is receiving electronic billing?

11. Is the format of your utility's electronic bill the same as the format of the paper bill? If not, how do they differ?

12. Does your company allow customers to pick the level of detail shown on their monthly bills, whether they receive bills on paper or electronically? If so, what are
the options?

13. When a customer asks for an explanation of various charges on the bill, do you have a standard, scripted explanation? If so, please provide a copy of the script.

14. What is the most frequent reported complaint about billing in your call center, customer service centers, walk-ins, etc.? What are the 5 billing issues consumers have most frequently contacted the utility about over the last three years? How do billing inquiries compare to all the inquiries received?

15. Do you show the volumetric (unit) rate and monthly customer (flat) charge? If not, is that information available to customers on request?

16. Do you place information about payment options on the bill? Are they easy to find on the bill?

17. What ways do you use to communicate to customers about their monthly bills? If an insert (that may be proven to be ineffective) is being used, what other ways do you communicate to consumers about the bill?

18. What physical location options are available for customers to make in-person payments, and what consumer educational materials are offered at those locations? What other services are provided? Are there limitations of education or answering questions at the physical locations?

19. What do you do to educate consumers of new rates, trackers, etc. on paper bills?

20. What is done to educate consumers of new rates, trackers, etc. on electronic bills?

21. In explaining the trackers, how are they communicated on the bill? What other communication methods does the utility use to explain trackers found on the utility bill?

22. If you issue a single bill for multiple services (electric and gas, for example), how do you communicate to the customer about partial payments or how to apply a payment to only one utility service on that bill?

23. Do you use bills to communicate energy efficiency methods and information? How do you communicate when the consumer is receiving an electronic bill? How often do you communicate about your energy efficiency programs?

24. Can you, have you, or will you divide up the fixed costs vs variable costs, and depict graphically (bar or pie chart), so customers can visualize the portion potentially changeable by conservation and efficiency initiatives? How would this
happen? If you can't, why not?

25. Does your utility provide a new customer with additional educational information about the bill's makeup?

26. Of those receiving an electronic bill, what percentage actively look at their online account for detailed information about their bill?

27. What are the benefits of electronic billing?

28. For consumers on payment arrangements, is that displayed on the bill? How?

29. For consumers on budget billing, is the balance clearly noted? What percentage of customers are on budget billing? Does the communication about the details on their bills differ for those who are on budget billing?

30. Do you offer simple or detailed billing in Spanish? Or bilingual versions?

31. How many Spanish speaking calls do you receive per year?

32. For those consumers who request detailed bills, is there additional effort in explaining the lists of costs such as trackers, rate increases, etc.?

33. What are the ways you communicate disconnect notices? (Bills, inserts, separate mailings, etc.) How do your methods of communicating disconnect notices comport to IURC rules?

34. What are the questions from the surveys you have sent out which were used to determine the format of the bills? Do your surveys differ between consumers who use paper billing versus those who electronically bill? How so?

35. What are the selection criteria for focus groups providing input on billing formatting and education?

36. How does an online consumer panel (as mentioned by NIPSCO) work and how does this differ from a survey or focus group research methodology? What are the selection criteria for such a panel?

37. What is the on-sert method (as mentioned by Vectren)? Is this effective? What research, even if in other industries, shows the effectiveness of an on-sert versus an insert?
Utility Questions for Consumers
(September 2015)

1. How can electronic/paperless billing be made more attractive to consumers?

2. What is the number one reason why a consumer is not using electronic billing?
   - I was not aware of the option
   - I receive my energy bill through my bank’s (or credit union’s) website
   - I am concerned with security of my personal information
   - I am afraid I would overlook the eBill in my email in-box
   - It is more difficult to keep track of online bills
   - I have had a prior negative experience
   - Other (Please list)

3. Are there additional billing options we should be considering?

4. Are there specific billing concerns dealing with water bills?

5. Are there specific billing concerns dealing with wastewater bills?

6. Are there specific billing concerns dealing with gas bills?

7. Are there specific billing concerns dealing with electric bills?

8. In order of importance, what are the top 3-5 information points on a paper bill?

9. In order of importance, what are the top 3-5 information points on an electronic bill?

10. Do you use your monthly utility bill as a way to understand your consumption as a consumer? Do you make personal changes (e.g. use less water, implement energy efficiency methods, etc.) based on this knowledge?

11. What information would be helpful to include on your energy bill to help you understand the value of implementing energy efficiency measures?

12. Do monthly bills include enough information for you to understand your utility bill?
a. Yes, there is just enough information.
   b. Yes, in fact, there is too much information.
   c. No, I would prefer more information.
      i. If no, what information would you like to see?

13. Do you find the information provided in the Bill Message valuable, if available?

14. What causes the most confusion on a utility bill?

15. When reviewing your utility bill, what is the top piece of information you look for beyond the amount due and the due date (e.g. weather, usage data, average consumption, etc.)?

16. Would more information about consumption and average bill aid with personal budgeting?

17. What additional items would you like to see on the bill?

18. What is the one change that would make the task of paying the bill more customer friendly (e.g. amount due in larger font, due date more clear, credit card payment processes and options, shorter payee name)?

19. Have surveys or focus groups been conducted to find out how utility bills can be improved by consumer groups? If so, what were the demographics of surveys and/or focus groups?

20. What communication methods regarding the explanation of a bill would be most effective? (e.g. online information, separate mailer, inserts with the bill, email communication, text messaging, etc.)

21. Of all the bills you receive in paper format for various home-related services, please select the service that provides the best bill format in your opinion.

   A) Electric bill
   B) Natural gas bill
   C) Credit card bill
   D) Water and/or sewer bill
   E) Cable bill
   F) Mobile phone bill
   G) Other

Please list the name of the company/provider and describe why you believe this bill has the best format.

22. Do you have an example of a best practice for electronic billing? If so, what was the practice?
23. Do you have an example of a best practice of a utility educating consumers about what is on the bill? If so, what was the practice?

24. On a scale of 1 to 5 – with 5 being extremely important - please rate the level of importance that your energy company provide the following information on your bill.

A) A glossary list of terms and definitions
B) Taxes you are paying for your energy service
C) Indication whether your meter read was actual or estimated
D) Separate line items noting the various trackers you are being charged for items, such as infrastructure improvements or environmental projects
E) Fixed costs, such as monthly service charges, that do not change as your monthly energy usage increases or decreases
F) Bar chart showing current and historical energy consumption
G) Weather/temperature data for the current and previous month(s)
H) Your next scheduled meter read date
I) Energy efficiency tips
J) Energy safety tips
K) Promotional messaging for new billing or payment options, rebates, etc.
L) Other ________________

25. How do consumers want to be notified about changes to their bill if they receive paper billing?
   • Bill insert
   • On-bill message
   • Email
   • Advanced notice of the change in a separate letter
   • Other

26. How do consumers want to be notified about changes to their bill if they receive electronic billing?
   • Embedded message within the eBill
   • Advanced notice of the change in a separate email
   • Advanced notice of the change in a separate letter
   • Other

27. What are the demographics of the group answering the questions provided to consumers by utilities?

28. When your billing contains correction to previously billed charges, how do you prefer to have this information identified on the bill?
   • Separate section of the bill with detail of cancelled or adjusted charges
• Separate mailing (letter or electronic) with details of the correction

How often do you read the inserts that accompany your billing?
   a. Sometimes   b. Usually   c. Never

What would make bill inserts more useful?

How easy is it for you to get information about your bill from your utility?
   • Easy; multiple contact channels and I receive prompt and courteous service
   • Challenging; long hold times and customer service representatives lack sufficient subject matter knowledge
   • Impossible; extended hold times, inconvenient hours of operation, customer service staff cannot assist with my inquiry, lack of empowerment and knowledge to resolve billing issues

Tom Stanton, Principal Researcher
Kathryn Kline, Research Assistant
National Regulatory Research Institute

Billing Symposium
Indianapolis Indiana
November 2015

Presentation outline

• Brief explanation of methods used and approach to the project
• Preliminary findings, all subject to change based on continuing research:
  • from literature review
  • from content analysis of state public utility billing rules for electric, gas, water & wastewater utilities
  • from state utility commission complaints data
• Next steps for this project
Methods used

- Review of literature, docket, case law, utility web-pages
- Initial, brief questionnaire sent to state commissions:
  - 30 responses, remainder from commission web-sites
  - Identifying state contact persons, billing rules citations and important billing-related dockets, and complaints data
- Billing rules content review and summary
  - Identifying common categories covered, plus unusual or unique aspects from specific states
  - In-state contacts check and verify research
- Review of state utility commission complaints data
  - Comparisons by various utility type
  - Report of billing-related complaints, % by topic

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Literature review

- Goals and objectives for billing and related communications rules (for commissions, utilities, consumers of different stripes, and society as a whole)
- Historical trends in literature:
  - Piecemeal progression over time
  - Energy efficiency and content-labeling thrust in 80s-90s
  - Competitive supplier billing since mid-90s
  - Recent trends towards integrating communications channels and content
  - Increasing customer engagement:
    - Grid modernization
    - Emergency communications
    - Social media
  - NRRI Report No. 12-07, Difficult Communications

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Billing rules categories

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<th>Service deposits</th>
<th>Estimated bills</th>
<th>Master metering</th>
<th>Historical usage</th>
<th>Dispute resolution</th>
<th>Third-party agents</th>
<th>Levelized billing</th>
<th>Payment methods</th>
<th>Payment assistance</th>
<th>Partial payments</th>
<th>Special payment plans</th>
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<th>Weather-related shut-off</th>
<th>Electronic billing</th>
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- Several other categories are not included, because they are nearly universal (for example: meter errors, accuracy and testing; unauthorized use; late payments and returned checks; and disconnections due to health and safety concerns or in a state of emergency).
- In Indiana, rules cover electric, gas, water & wastewater. Industry types covered varies by state.

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Historical usage

- Rules from 21 total states require utilities to provide customers with historical usage data, usually for 1-year back
  - This could be a regular practice elsewhere, like in Indiana for some utilities, without being mentioned in formal rules
- Only one state (Idaho), requires the information to be provided only on the bill, one state (Arizona) requires it in other communications but not on the bill, and the other 19 states require it both on bills and in other communications
- Three states require utilities to provide it only upon customer request (New Hampshire, South Carolina, and Tennessee), and one state (Wisconsin) explicitly requires reporting historical weather data in addition to usage data

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Payment assistance

- Payment assistance rules generally require utilities to provide information to customers about non-utility sources of financial assistance, and also often about available energy efficiency or conservation programs
- Requirements are in rules from 27 states (not Indiana)
- Information is required to be both on bills and in other communications in 22 states
- Information is required to be on bills only in Alaska, Connecticut, and Kansas
- Information is required not on bills but in other communications in one state (Arkansas)

Weather-related shut-off

- These rules typically prohibit utility shut-offs during certain months, and include provisions for special payment plans and payment assistance information
- Included in rules from 31 states, most states covering winter heating months, but a few states cover only summer air conditioning months. Only Georgia’s rule covers both heating and air conditioning periods
- Not included in Indiana, and Kentucky, but rules are included in Illinois, Ohio, and Michigan
Preliminary complaints data

- Complaint data based on responses from 17 states
  - 17 states provided data on complaints by industry type
  - 12 states provided data on complaints by topics/issues
  - 8 additional states said they can do queries for us
- Timelines are not uniform
  - Length of time information collected varies
  - Year of data reporting varies
  - 2012 is earliest data used
- Complaint data varies widely, so only percentages are reported

Complaint classifications

- There is little consistency in how states code complaints by topic, which makes comparisons difficult
Complaints by industry type

Average of 17 states

Indiana

- While we have information on billing rules from all 50 states, only 17 states provided complaints data.

Complaints by region

- State by state, complaint data can change markedly in response to known events
- Some state commissions do not track complaint data for all industry types

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Next steps

- Next steps for literature review
  - Review of sample utility bills and explanations
- Next steps for billing rules data:
  - finalize missing data
  - confer with each state to make sure our understanding is correct
  - Finalize overall summary and identify any particularly interesting ideas from specific states
- Next steps for complaints data
  - Follow up with states that may provide data details
- Preliminary report completed by mid-January
- Report to be published by second week of February
 Billing Symposium Survey

1. Are you with a
   □ Consumer Group   □ Utility   □ Other

2. The symposium was a valuable experience.
   □ Strongly agree   □ Agree   □ Not sure   □ Disagree   □ Strongly disagree

3. Would you attend similar symposiums in the future?
   □ Yes   □ Maybe   □ No

4. I felt my views were respectfully considered.
   □ Strongly agree   □ Agree   □ Not sure   □ Disagree   □ Strongly disagree

5. What aspect of the symposium did you find to be most useful, and why?

_________________________________________________________________________
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6. What aspect of the symposium did you find to be least useful, and how can it be improved?

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7. If the IURC continues to hold these types of forums, how can we improve the format?

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8. Please provide any additional feedback about the symposium.

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Thank you for completing our survey!