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February 23, 2017

Via Electronic Filing

Re:

Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2nd Floor (filing room) PO Box 3265 Harrisburg, PA 17105-3265

Joint Application of Pike County Light and Power Company, Corning Natural Gas Holding Corporation and Orange and Rockland Utilities, Inc. for: a Certificate or Certificates of Public Convenience Evidencing the Pennsylvania Public Utility Commission's Approval of: the Transfer by Sale of 100% of the Issued and Outstanding Stock of Pike County Light & Power Company; Docket Nos. A-2015-2517036 et al.; Compliance Filing Letter Requesting Contractor Approval

Dear Secretary Chiavetta:

In compliance with Paragraph 36(h) of the Joint Petition for Settlement in the above-captioned proceeding ("Settlement"), approved by Commission Order dated August 11, 2016, Pike County Light and Power ("PCL&P") hereby requests that a Secretarial Letter be issued within 10 days approving the use of certain contractors. In relevant part, Paragraph 36(h) of the Commission-approved Settlement provides that the Company may demonstrate that staffing some or all of certain positions:

through contractor employees is cost-effective and fulfills PCL&P's obligation to provide service in accordance with the requirements of the Public Utility Code. If PCL&P determines to use contractors for any of the above positions, it shall provide its demonstration to the Commission for review and approval, which shall occur within 10 days of filing. This review and approval requirement shall expire 18 months after the date of closing.

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As described below PCL&P requests the Commission approve its use of (a) transitional contract employees, who after a probationary period during which they will be evaluated and supervised, may become permanent employees, and (b) a technical field design services contractor on a one-year, renewable contract. Because the Commission-approved Settlement provides for expedited review and approval within 10 days, PCL&P requests that a Secretarial Letter be issued no later than March 6, 2017, approving this request for the following two classes of contractors identified below.

Transitional Contract Employees. PCL&P requests approval for the use of three transitional contract employees for the positions of administrative assistant and two customer service representatives. The administrative assistant position assists the General Manager in various support roles, and performs customer service roles. The customer service representatives will interface with customers to provide customer service and support. The job descriptions for these positions are enclosed.

PCL&P utilizes a hybrid approach to hiring these employees by using an employment agency to assist in identifying qualified candidates, and after extensive interviews and background checks, hires these individuals on a probationary basis through the employment agency. If in PCL&P's judgment these individuals excel at these positions, PCL&P plans to hire them on a permanent basis as full PCL&P employees within six months of their initial agency contract commencement. Currently, PCL&P has engaged an administrative assistant through the employment agency. Regarding the customer service representatives, PCL&P with assistance from the consulting employment agency, distilled the pool of candidates to eight, further refined the pool to four and performed an initial interview with each of them, and will have a final round of interviews with three candidates. PCL&P then plans to engage two customer service representatives through the employment agency by April 2017 with the expectation that they will, based upon performance, become full-time employees after a probationary period.

PCL&P has determined that using this hybrid, transitional contract approach to hiring these employees is cost-effective and will enable PCL&P to continue to provide service in accordance with the Public Utility Code. Utilizing an employment service to identify potential candidates with suitable backgrounds for customer service work, perform administrative human resources functions related to the probationary hiring process, including background checks, and assume overhead costs with respect to these employees during their probationary period, saves PCL&P time and direct and indirect costs, especially related to training. Utilizing this approach during PCL&P's transitional period of change of ownership allows for a smooth transition by enabling PCL&P to quickly identify and obtain qualified individuals on a probationary basis. These employees work or will work under the direct supervision of Steven Grandinali, PCL&P's General Manager, and Katrina Colvin-Stilts, PCL&P's Customer Service Manager.

Technical Field Design Services Contractor Position. PCL&P requests approval for the use of a Technical Field Design Services firm with whom PLC&P has a yearly, renewable Master Agreement. This firm has provided the use a former Orange and Rockland ("O&R") employee

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familiar and experienced with PLC&P and its operations. This former employee performs field design work to connect new or upgrade existing customers. This includes new business electric and gas utility service design work, meter and service equipment inspections, field coordination and meeting with customers and building contractors in the field to enable service connections to be completed. Because this contractor's employee is a former O&R employee and has extensive experience with PCL&P's system, he is an ideal candidate for this position. The job description for this contractor is enclosed.

PCL&P has determined that utilizing this contractor is cost-effective and will enable PCL&P to provide service in accordance with the Public Utility Code. PCL&P is currently in peak season of new customer connections. The transitional services agreement with Orange and Rockland for the provision of certain transitional services to PCL&P during the initial phase of new ownership does not provide for these services. Thus, PCL&P determined the most efficient means of providing customers with these services was to utilize a contract employee who is already experienced in this field and specifically with PCL&P's system as a former O&R employee.

Enclosed is the signed verification of Steven Grandinali, PCL&P's General Manager. PCL&P requests that a secretarial letter be issued approving the use of contractors as described above within 10 days (March 6, 2017) pursuant to Paragraph 36(h) of the Order.

Very truly yours,

Thomas J. Sniscak Whitney E. Snyder

Thomas J. Smiscale

Cc: Dan Searfoorce, TUS (via e-mail and U.S. Mail)
David Washko, TUS (via e-mail and U.S. Mail)

Per Certificate of Service

Job Title: Administrative Assistant

Job Description:

SUMMARY OF RESPONSIBILITIES

Under direct supervision from the General Manager, performs a variety of administrative functions in support of the Office, the PCL&P Organization, the Facility and the General Manager. Works to facilitate the smooth operation of the day-to-day Organization activities.

MAJOR DUTIES

- Greets and provides feedback/information to visitors, customers and callers, handles their inquiries and takes phone or email messages, and transfers/directs them to the appropriate persons according to their needs; respond to inquiries; research questions and resolve customer problems
- Composes, types, and distributes meetings notes, routine correspondence, Regulatory or internal letters and reports
- Operates and insures proper operation of office equipment such as fax machines, copiers, and phone systems
- Uses computer/tablet for assigned work with spreadsheets, word processing, database management, and any other needed applications such as Edit /Publish PCL&P forms and documents
- · Prepares and processes incoming and outgoing mail
- Creates and maintains spreadsheets for tracking purposes such as accounts payable invoices, New Business Applications, Cut-in and Gas Certifications
- Creates and maintains spreadsheets for data entry for preparation of comprehensive PCL&P budgetary goal analysis
- Sets up, organizes, and maintains paper and electronic filing systems for records, (Record Retention requirements) correspondence, and other material including off-site storage, as needed in a logical and easily retrievable manner
- Maintains calendar; schedules appointments, meetings, and conference calls as needed; for GM, Public Affairs Manager and other future staff; prepares agendas for Office staff meetings
- Orders and ensures adequate and appropriate supplies are available for the office including stationary, PPE, communication accessories etc.
- Manage Building/Facilities including Office Cleaners/Landscaper/Refuse
 Removal/Generator Maintenance/ Inspection and Upkeep of Safety equipment, First Aid Kits/AED/Fire Extinguishers and all related equipment in facility
- Update PCL&P Website, Facebook and social media for customer, contractors and inspection agency information
- Storm Response Support Role
- · Support Customer Service function during system electric/gas disturbances
- Maintain all internal postings related to Occupancy, OSHA and other Federal or local requirements

Required Skills

KNOWLEDGE, SKILLS & QUALIFICATIONS

- High School diploma
- 2-4 years of administrative experience; some customer service/relations work experience preferred
- Knowledge of administrative and clerical procedures and systems such as word processing, managing files and records, and other standard office procedures and terminology; demonstrates Microsoft Office skills, especially Word and Excel
- Become knowledgeable of the new business company policies, procedures and tariff rate schedule, as well as electric/gas/meter workflow between PCL&P and current or future Utility, Contractor or Vender service provider for efficient project flow and completion
- Actively looks for ways to help internal and external customers and be responsive in a timely manner.
- Integrity and a positive attitude; a self-starter demonstrating initiative while effectively adapting to change
- Must have valid driver's license

CUSTOMER SERVICE REPRESENTATIVE

JOB DESCRIPTION

TITLE: Customer Service Representative

DEPARTMENT: Customer Service

DIRECT REPORT: Customer Service Manager

Job Qualifications:

- High School Education
- 2 to 5 Years of Customer Service experience
- Basic computer skills
- Able to pass drug testing requirements from various governmental agencies

Responsibilities:

Daily/Monthly

- Process incoming customer calls for electric outages and gas odor/no gas calls
- Process incoming customer calls and in-person requests for change of service address, meter readings, new customer applications, etc.
- Possess high level of proficiency regarding CIS software used by gas/electric utility company every customer's phone number.
- Update any customer personal information as verified by the customer.
- Document and track customer contacts.
- Provide data for customer service satisfaction metrics as relevant.
- Schedule all necessary service orders daily.
- Run the service list to verify service orders to be completed in-field the next business day.
- Call any landlords, as documented, whose tenants have requested disconnect of their accounts.
- Verify that any account scheduled for shut off by tenant is a valid shut off.
- Call customers to reschedule appointments the customer did not keep the previous day.
- Write Request for Refund/Transfer Request for credit balances on closed accounts.
- Receive and process walk-in customer payments.
- Collect payments from night deposit box.
- Open, process, and balance customer night deposit payments.
- Open, process, and balance customer payments received by mail.
- Run and stamp checks for bank deposit.
- Complete daily balancing sheet for all payments received.
- Balance cash drawer.
- Run MVRS programs so that meter reading is completed as scheduled and readings are available for billing.
- Assign routes to each meter reader for completion.

- Review turn on orders, shut off orders, meter transfers, and meter-not-read appointments and assign to Meter Credit Attendant(s) for completion. Collection work is prepared for Meter Credit Attendant. Collection work is prepared for meter readers when there are not any meter routes to be read.
- Review completed work on service orders. Record collection work on AS400 as completed.
 Write up lock off non-payment accounts and generate orders.
- Prepare billing information for daily billing (average temperature information, service dates, etc.).
- Review Meter-Not-Read letters for mailing. Generate orders as needed for meters not read in 10 months.
- Maintain "After-Hours" Meter Not Read List, and assign to be completed.
- Liaison for NYS Public Service Commission for customer complaints. Contact customers and respond as required to PSC.
- Assist Customer Collections Representative with calls from Department of Social Services.
- Assist Customer Collections Representative in receiving and recording HEAP approvals for customer accounts.
- Liaison for Catholic Charities, Salvation Army, American Red Cross, and Office for Aging.
- Maintain Gas Service Denials file.
- Take incoming customer calls and in person inquiries on delinquent bills and set up payment terms.
- Take incoming customer calls and in person inquiries on bills.
- Customer Correspondence.
- Approve adjustments from over estimates on customer accounts.
- Approve penalty allows and balance transfer requests on customer accounts.
- Maintain Return Check file and collect payment for checks.
- Review returned gas bills for new addresses and for customers who moved without notifying CNG. Generate service orders as needed to terminate service.
- Process payments made to the attention of the credit department from both Night Deposit and Post Office mail.
- Review and approve daily summary reports from billing.
- Approve daily billing.
- Assist field personnel from other departments with information from customer account records.
- Home Energy Fair Practices Act (HEFPA) Liaison- Disconnection results in a customer being unable to use heating facilities (gas leaks/warning tags)
- Review daily logs from C & T Call Center.
- Prepare collection calls for C & T as per schedule, and fax to C & T.
- Review daily collection call log for C & T.
- Liaison for Metrix Matrix Customer Satisfaction Survey.
- Gather contact information and give to IT Manager for Customer Survey work.
- Address Customer Advocate Alerts.

- Prepare list of accounts to be locked off. Distribute lists to Customer Collections Representative and Stand-by personnel.
- Request meter changes on meter problems. Maintain Meter Investigation file.
- Prepare Company and PAPUC reports as required.
- Update Written Payment Agreements for processing.
- Prepare detailed meter reading calendar, MRVS schedule for meter routes, schedule meter-not-read cards and letters to be mailed. Schedule "After Hours" Meter-Not-Read to be completed.
- Review reports from customer satisfaction survey metrics.
- Prepare Collection Call schedule.
- Review potential write off list for transfers.
- Send final letter to potential write off accounts.
- Determine write offs and run program to process.

Annually

- Prepare general meter reading schedule for each month.
- Prepare Dormant Account Review each September as per PSC and assign to Meter Credit Attendant to complete.
- Prepare and have printed budget bill stuffer as appropriate.
- Prepare and have printed HEAP stuffer for mailing as required.
- Prepare and have printed Customer Bill of Rights stuffer for mailing as required.
- Maintain Bankruptcy files. See that bankruptcy accounts are added to write off lists. Request
 Security Deposits on active accounts filing bankruptcy. Complete Proof of Claim forms.
- Telephone delinquent accounts to make payment arrangements.
- Prepare documentation for Theft of Service situations.
- Run edits for 15 day delinquent notices and 72 hour delinquent notices. Review accounts and post notices for printing and updating.
- Act as Liaison for Department of Social Services and Home Energy Assistance Program (LIHEAP).
- Verify and process LIHEAP vouchers and return for payments.
- Process LIHEAP payments.
- Maintain records for accounts on Public Assistance, and voucher direct pay accounts. Follow payments being received.
- Close and update meter change orders.
- Prepare Meter Inventory.
- Send write off accounts to collection agency along with printed account history.
- File completed Customer Refund Request forms.
- Create new key tags for customer keys in our possession and note all relevant accounts.
- Update all Active Landlord (ACT/LLD) accounts as needed.

Job Title: Technical Field Designer

Job Description:

SUMMARY OF RESPONSIBILITIES

Under direct supervision from the General Manager, perform a variety of field investigation functions included but limited to providing electric and gas service to new and existing customers, damage assessment, customer inquiries related to service quality, tree investigations, perform visual electrical equipment and aperture inspection and reporting, etc. and work to facilitate a smooth operation between of the day-to-day field activities.

MAJOR DUTIES

- New Business:
 - Meet Applicant, electrical/plumber contractors
 - o Design new and upgrade service for electric overhead, underground and gas
 - o Inspect Service work by contractor
 - o Design and layout subdivision
- System Capital Work:
 - o Layout Design Capital electric reinforcement projects
 - o Design Work Order Packages for Electric Distribution Projects
 - o Prepare designs for bid packages turn key
 - o Review and prepare bid package evaluations
- Inspection and Maintenance
 - Perform pole to pole visual inspections and prepare work orders
- Implement and develop a Work Management System
 - o Assist with creation compatible work units of measure
 - o Manpower plan and forecast
- Storm Restoration:
 - Provide damage assessment personnel
 - o Provide site safety personnel
- Easement and Right of Way acquisition preparation and investigation

Required Skills but not limited too

KNOWLEDGE, SKILLS & QUALIFICATIONS

- High School diploma;
- · 2 or 4 year Degree preferred or equivalent;
- 8-10 years electric or gas utility field experience;
- General knowledge with electric or gas construction practices and operation
- Become familiar with Company electric and gas construction standards
- Become familiar with Company electric and gas inspection and maintenance procedures and terminology;
- Become knowledgeable of the new business company policies, procedures and tariff rate schedule, as well as electric/gas/meter workflow between PCL&P and current or future Utility, Contractor or Vender service provider for efficient project flow and completion

- Some experience interacting with customers;
 Integrity and a positive attitude; a self-starter demonstrating initiative while effectively adapting to change
 Must have valid driver's license

VERIFICATION

I, Steven L. Grandinali, General Manager of Pike County Light and Power Company, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Steven L. Grandinali

General Manager

Pike County Light and Power Company

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

BY ELECTRONIC AND FIRST CLASS MAIL

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Thomas J. Sniscak, Esquire Whitney E. Snyder, Esquire

DATED: February 23, 2017