

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY COMMISSION

v.

PEOPLES NATURAL GAS COMPANY  
LLC

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Docket No. R-2018-3006818

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**PREPARED REBUTTAL TESTIMONY  
HEATHER DOYLE-CONLEY  
SENIOR DIRECTOR, CUSTOMER SERVICE  
PEOPLES NATURAL GAS COMPANY LLC**

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DATE SERVED: May 28, 2019

DATE ADMITTED: \_\_\_\_\_

Peoples Natural Gas Statement No. 12-R

**PREPARED REBUTTAL TESTIMONY OF  
HEATHER DOYLE-CONLEY**

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Heather Doyle-Conley and my business address is 375 North Shore Drive,  
3 Pittsburgh, PA 15212.

4

5 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

6 A. I am employed by Peoples Natural Gas Company LLC (“Peoples” or “Company”) as Senior  
7 Director, Customer Service.

8

9 **Q. PLEASE STATE BRIEFLY YOUR EDUCATIONAL BACKGROUND AND**  
10 **PROFESSIONAL EXPERIENCE.**

11 A. I have been employed by Peoples since February 1990. I have been in Customer Service  
12 throughout my entire career, holding various positions during my tenure including  
13 Training & Development, Supervisor, Manager, etc. I currently serve as Senior Director,  
14 Customer Service.

15

16 **Q. WHAT ARE YOUR RESPONSIBILITIES AS SENIOR DIRECTOR, CUSTOMER**  
17 **SERVICE?**

18 A. My responsibilities include overseeing the Call Center, Billing, Meter Reading, and  
19 Credit/Collection operations.

20

1 **Q. HAVE YOU PREVIOUSLY SUBMITTED DIRECT TESTIMONY IN THIS**  
2 **PROCEEDING?**

3 A. No.

4  
5 **Q. WHAT IS THE PURPOSE OF THIS REBUTTAL TESTIMONY?**

6 A. I am responding to testimony put forth by Office of Consumer Advocate (“OCA”)  
7 witness Roger D. Colton as well as The Coalition for Affordable Utility Services and  
8 Energy Efficiency in Pennsylvania (“CAUSE-PA”) witness Harry Geller. I am  
9 addressing several issues raised by these witnesses. These topics include improving  
10 multiple aspects of customer service, “customer satisfaction” surveys, security deposits,  
11 and medical certificates.

12  
13 **Q. HOW DO YOU RESPOND TO MR. COLTON’S RECOMMENDATION TO**  
14 **ADOPT A PROCEDURE UNDER WHICH THE COMPANY WILL NOT**  
15 **DISCONNECT A CONFIRMED LOW-INCOME CUSTOMER FOR**  
16 **NONPAYMENT WITHOUT FIRST OFFERING TO ENROLL THAT**  
17 **CUSTOMER IN THE CUSTOMER ASSISTANCE PROGRAM (“CAP”) AND**  
18 **PROVIDING A PLAIN ENGLISH NOTICE OF THAT OFFER ALONG WITH A**  
19 **PLAIN ENGLISH DESCRIPTION OF THE ARREARAGE FORGIVENESS**  
20 **BENEFITS AVAILABLE THROUGH CAP (OCA Statement No. 4, p. 25)?**

21 A. The Company educates and refers confirmed and unconfirmed low income customers to  
22 CAP, Dollar Energy Fund, Low Income Home Energy Assistance Program (“LIHEAP”),  
23 etc. to ensure customers have access to any and all programs that will help them manage

1 their account. Peoples offers to transfer customers to the CAP administrator for  
2 consideration of the program. When transfer is not convenient for the customers, the  
3 Company provides them with a direct contact number. Moreover, the Company's shut-  
4 off notices include details about protections from shut off. Specifically, the second page  
5 of the shut-off notice advises the customer several times to contact the Company about  
6 payment, payment arrangements or special assistance programs. The second page of the  
7 notice also advises the customers that if their income is at or below 250% of the federal  
8 poverty guidelines, the Company would first ask the Pennsylvania Public Utility  
9 Commission ("PUC") for permission prior to disconnecting during the winter  
10 moratorium.

11  
12 **Q. HOW DO YOU RESPOND TO MR. COLTON'S RECOMMENDATION THAT**  
13 **PEOPLES SHOULD EXPAND AND IMPROVE ITS BUDGET BILLING (OCA**  
14 **Statement No. 4, pp. 26-32)?**

15 A. The Company recognizes the benefits of Budget Billing and seeks to make it available to  
16 all Residential customers. Peoples has two Budget Billing plans for the customers to  
17 choose from: (1) a levelized amount; and (2) an amount that is reviewed and adjusted  
18 quarterly if needed. In addition to these two plans, the Company has four Installment  
19 Plans for when the customer has any type of arrearage. This provides the customer the  
20 opportunity to amortize the outstanding balance. Using Budget Billing as the foundation,  
21 the Installment Plans add an installment amount to the Budget Billing amount. This  
22 Installment Plan portion is determined by customer income and household occupancy.  
23 The Company's current budget billing plans are sufficient for residential customers and  
24 do not need to be modified at this time.

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**Q. HOW DO YOU RESPOND TO MR. COLTON’S CONTENTIONS THAT PEOPLES’ POLICY OF DENYING BUDGET BILLING TO CUSTOMERS WHO HAVE ARREARS OF MORE THAN 30 DAYS IN AGE SHOULD BE ELIMINATED AND THAT A CUSTOMER IN ARREARS SHOULD BE PLACED IN BUDGET BILLING AND ALLOWED TO SPREAD THEIR ARREARS OVER A PERIOD CONSISTENT WITH THE PUC’S REGULATIONS (OCA Statement No. 4, pp. 31-32)?**

A. The Company does not deny customers the ability to enroll in Budget Billing if they have arrears of 30 days or more. Customers can enroll in Budget Billing if they have a balance. However, to ensure customers are on the correct plan for their income level and balance, the Company limits the size of the balance for proper plan allocation. In cases where the balance is more than \$300, income and occupancy information would be discussed so that Peoples can establish an Installment Plan plus Budget Billing, providing the customer the ability to pay for annual consumption while paying a portion towards the arrearage.

**Q. WHAT RECOMMENDATIONS DOES MR. COLTON MAKE REGARDING THE NOTIFICATION PROCEDURES FOR DISCONNECTIONS AND CAP EXITS?**

A. Mr. Colton makes the following recommendations.

- The Company should seek to increase the role of Community Based Organizations (“CBOs”) through an expansion of the PUC’s third party notification program.

- 1 • Peoples should include a tariff provision for the implementation of 52 Pa. Code § 56.131.
- 2 • The Company should make third party notification authorization forms be made widely
- 3 available through non-utility access points.
- 4 • The Company should authorize and engage CBOs to incorporate third party notification
- 5 authorizations into applications for other assistance (*e.g.*, CAP, hardship grants).
- 6 • The Company should broaden its use of third party notifications to the full extent allowed
- 7 by the PUC’s regulation.

8

9 **Q. WHAT IS YOUR RESPONSE TO MR. COLTON’S RECOMMENDATIONS?**

10 A. The Company has already implemented 52 Pa. Code § 56.131 and allows customers to

11 designate an individual or agency to receive delinquent or termination notices to help

12 avoid termination and does not believe additional tariff language is needed at this time.

13 Third Party Notification is readily available on peoples-gas.com, peopleseaccount.com,

14 bill inserts and social media campaigns. Peoples witness Rita Black addresses the role of

15 CBOs to help with third party notification programs in her rebuttal testimony.

16

17 **Q. HOW DO YOU RESPOND TO MR. COLTON’S CLAIM THAT PEOPLES’**

18 **CUSTOMER SATISFACTION SURVEYS DO NOT SUPPORT THE FINDING**

19 **OF EXCELLENT CUSTOMER SERVICE (OCA Statement No. 4, pp. 45-50)?**

20 A. The Company does engage in Voice of Customer (“VOC”) surveys. Using the email

21 address on file, the Company sends emails to customers who have had a recent contact

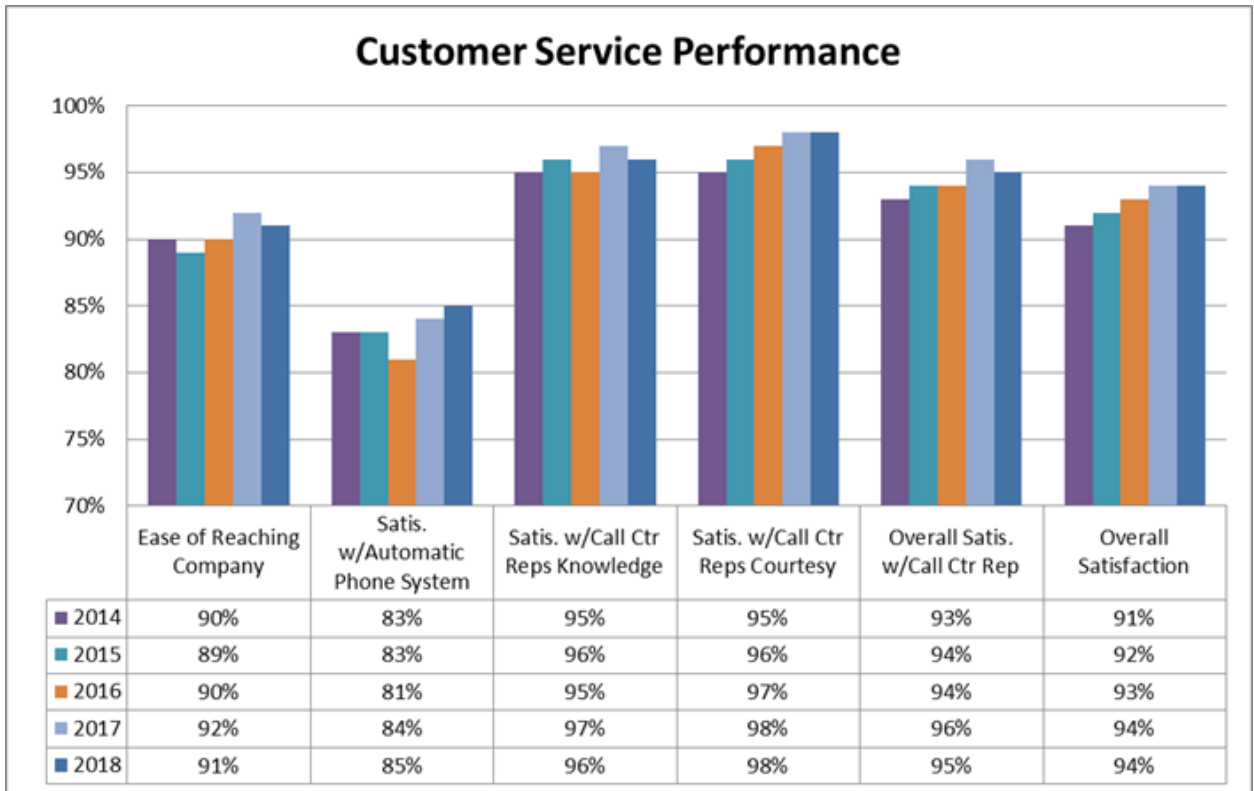
22 with the Company. The email contains a link to Survey Monkey. The customer is asked

23 to complete just a few questions to keep it a low effort experience. The questions are: (1)

1 “Overall how would you rate your experience with our Customer Service Center?”; (2)  
2 “How well did the Customer Service Representative address your questions and  
3 concerns?”; (3) “How much time did it take us to help resolve the reason for your  
4 contact?”; (4) “Did the Customer Service Representative mention: eAccount, eBilling,  
5 Budget Billing, Protection Plans, Customer Assistance Program?”; and (5) “Any  
6 additional comments, questions or concerns are appreciated. Please enter in the comment  
7 box.”

8 The Company uses these surveys as a way to address immediate trends, resolve  
9 customer issues quickly and to manage customer’s expectations. These surveys are used  
10 internally and are not shared or reported outside the organization.

11 Additionally, in the customer satisfaction surveys provided during discovery  
12 (OCA-III-39), the survey results contain scores for Overall Satisfaction, Representative’s  
13 Courtesy, Representative’s Knowledge and Overall Call Handling, not just Satisfaction  
14 with IVR or the Ease of Reaching the Company. Peoples’ scores have increased  
15 especially in the areas of interaction with a Representative as well as Overall Satisfaction  
16 (as seen in the chart below). Customers have consistently scored Representative  
17 Interaction and Overall Satisfaction in the 90’s. The Overall Satisfaction alone increased  
18 year over year from 2014 through 2017, and the Company maintained the rating 94% in  
19 2018. The three-year average of Top Performer in the State was 94%. These results  
20 demonstrate that customers are extremely satisfied with Peoples’ customer service.



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3 **Q. HOW DO YOU RESPOND TO MR. COLTON’S CONCERNS THAT PEOPLES**  
 4 **SHOULD BE REQUIRED TO DOCUMENT THAT THE COMPANY HAS**  
 5 **PROCEDURES IN PLACE TO IDENTIFY HOUSEHOLDS THAT MEET THE**  
 6 **INCOME ELIGIBILITY ESTABLISHED BY PUC REGULATION FOR COLD**  
 7 **WEATHER PROTECTIONS AND THOSE PROCEDURES DO NOT**  
 8 **UNREASONABLY RESTRICT THE ACCESS OF INCOME-ELIGIBLE**  
 9 **CUSTOMERS TO THOSE PROTECTIONS (OCA Statement No. 4, p. 49)?**

10 **A.** When PUC guidelines exist, the Company follows those guidelines. The Company’s  
 11 termination notices include this information, provide the customers with an example, and  
 12 advise the customers to contact the Company immediately so it can record their income  
 13 and attempt to provide them with a re-payment option.



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**Q. HOW DO YOU RESPOND TO MR. GELLER’S CONCERNS REGARDING THE COMPANY HOLDING \$9,297.25 IN SECURITY DEPOSITS ON 95 CUSTOMER ACCOUNTS CONFIRMED AS LOW-INCOME (CAUSE-PA Statement No. 1, pp. 40-41)?**

A. As of April 3, 2019, all 95 Security Deposits totaling \$9,297.25 have been removed.

**Q. HOW DO YOU RESPOND TO MR. GELLER’S CONCERNS REGARDING PEOPLES’ MEDICAL CERTIFICATE TRAINING MATERIAL (CAUSE-PA Statement No. 1, pp. 41-42)?**

A. When PUC guidelines exist, the Company follows those guidelines. The training materials reference the relevant statutes and regulations (*e.g.*, 66 Pa. C.S. § 1403 and 52 Pa. Code §§ 56.113, 56.114, 56.116, and 56.191). The process within the Customer Service Center is to educate customers and ask if a medical condition exists in the home. In addition, medical certificate information can be found on termination notices, the Company’s website ([peoples-gas.com](http://peoples-gas.com)), and the PUC’s guide entitled, “Your Rights and Responsibilities as a Utility Consumer. Upon request for a medical certificate, the Company representative sends a form to either the customer or requested medical professional, a hold is placed on the account, and the customer is advised of his or her duty to pay undisputed charges. When the medical certificate is returned, the Credit Team reviews the account. If the customer has not met the obligation to pay under Section 56.116 of the PUC’s regulations and this is the third renewal on the same arrearages, the Company is not required to honor a third request, until such time as the customer eliminates the arrearages.

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**Q. PLEASE SUMMARIZE YOUR THOUGHTS ON THE RECOMMENDATIONS MADE BY MR. COLTON AND MR. GELLER?**

A. The Company agrees with expanding the number of customers on Budget Billing; however, Peoples believes it is taking appropriate measures to educate and increase participation.

The Company disagrees that customers are denied an opportunity to participate in Budget Billing. The Company allows customers with arrearages to participate; however, it is necessary to pair the Budget Billing with an Installment Plan if the balance is greater than \$300.00. This provides the customer with the ability to keep current while also paying down the arrears.

The Company disagrees with Mr. Colton’s recommendation regarding Third Party Notification. The Company complies with Section 56.131 of the PUC’s regulations. The Company makes Third Party Notification available on the website, customer portal, Customer Service Representatives, bill inserts, and Social Media campaigns.

Lastly, the Company disagrees with Mr. Geller’s recommendation to inform customers of indefinite Medical Certificates. This provides a false hope to the customer. Customers have a Duty to Pay undisputed charges. The Company strictly adheres to the regulation set forth by the PUC.

**Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

A. Yes.