

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY COMMISSION

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v.

Docket No. R-2018-3006818

PEOPLES NATURAL GAS COMPANY
LLC

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

DATE SUBMITTED: June 17, 2019
DATE ADMITTED:

Peoples Statement No. 12-RJ

**PREPARED REJOINDER 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
7 Senior Director, Customer Service.

8

9 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY IN THIS**
10 **PROCEEDING?**

11 A. Yes, I submitted Peoples Statement No. 12-R, which was my rebuttal testimony. I did
12 not submit direct testimony in this proceeding.

13

14 **Q. WHAT IS THE PURPOSE OF THIS REJOINDER TESTIMONY?**

15 A. I am responding to the surrebuttal testimony submitted by Office of Consumer Advocate
16 (“OCA”) witness Roger D. Colton as well as The Coalition for Affordable Utility
17 Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) witness Harry Geller.
18 In particular, my rejoinder testimony will focus on their allegations concerning various
19 aspects of customer service, “customer satisfaction” surveys, security deposits, and
20 medical certificates.

21

2 **Q. OCA WITNESS COLTON ASSERTS THAT YOUR REBUTTAL TESTIMONY IS**
3 **INCONSISTENT WITH THE COMPANY’S DISCOVERY RESPONSES ABOUT**
4 **THE ENROLLMENT OF CUSTOMERS WITH ARREARS OF 30 DAYS OR**
5 **MORE IN BUDGET BILLING. (OCA St. No. 4-SR, pp. 6-8.) WOULD YOU**
6 **PLEASE RESPOND?**

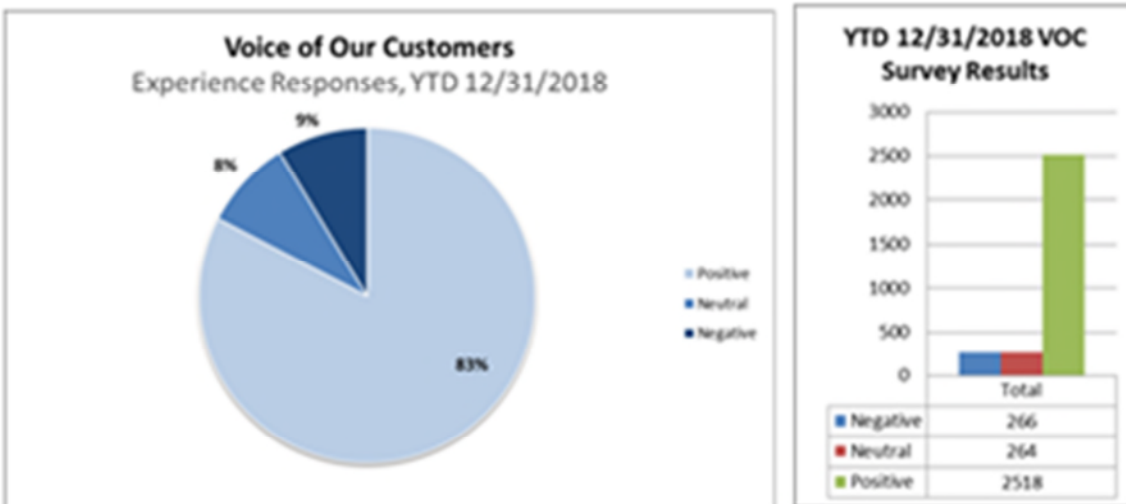
7 A. As I stated in my testimony, Peoples do not deny customers the ability to enroll in Budget
8 Billing if they have arrears of 30 days or more, so long as the account balance is less than
9 \$300. Mr. Colton claims this is inconsistent with the Quick Reference Guide produced in
10 discovery in response to OCA-III-19. To clarify, the Company made this change to its
11 Budget Billing enrollment in June 2017, and since that time, Peoples’ customer service
12 representatives have followed that requirement. However, that change was not reflected
13 in the Quick Reference Guide. Peoples has since revised the Quick Reference Guide, as
14 seen in the attached Peoples Exhibit No. HDC-RJ-1.

15
16 **Q. OCA WITNESS COLTON ALSO CLAIMS THAT THE COMPANY FAILED TO**
17 **PROVIDE INFORMATION ABOUT ITS VOICE OF CUSTOMER (“VOC”)**
18 **SURVEYS. (OCA Statement No. 4-SR, p. 9.) PLEASE RESPOND.**

19 A. The Company did not provide VOC survey details in discovery because the OCA asked
20 for “customer satisfaction” surveys, which, to Peoples, means the Research American
21 survey data, not the VOC surveys.

22 However, it is clear now that the OCA was requesting further information about
23 the VOC surveys in those discovery requests. Therefore, attached hereto as Peoples

1 Exhibit No. HDC-RJ-2 is a copy of the VOC survey that is sent via email to customers
2 within 48 hours of a customer contact. As seen in the exhibit, the categories for the
3 customers to provide feedback in the VOC survey are consistent with those listed in my
4 rebuttal testimony. Furthermore, although copies of all the customers' VOC survey
5 responses are not readily available, Peoples was able to compile the VOC survey data for
6 2018. In total, the Company sent 67,641 VOC surveys in 2018. Customers sent 3,048
7 responses to those surveys, which is a response rate of approximately 4%. Of the 3,048
8 responses, 2,518 (83%) were positive, 264 (8%) were neutral, and 266 (9%) were
9 negative. See the charts below:



10
11
12 **Q. PLEASE RESPOND TO OCA WITNESS COLTON'S ALLEGATIONS ABOUT**
13 **THE COMPANY'S COLD WEATHER PROTECTIONS FOR CUSTOMERS**
14 **WITH INCOME AT OR BELOW 250% OF THE FEDERAL POVERTY LEVEL**
15 **("FPL"). (OCA St. No. 4-SR, pp. 9-11.)**

1 A. Mr. Colton alleges that my rebuttal testimony, which states that the Company follows the
2 PUC's guidelines concerning cold weather protections, is inconsistent with certain
3 discovery responses.

4 To clarify, Peoples does in fact provide cold weather protections for customers
5 with income at or below 250% of the FPL. In fact, Peoples only considers cold weather
6 termination for accounts for which the Company has verbally obtained income data that
7 indicates the customer's income exceeds 250%. On that basis, Peoples treats accounts
8 without income data as though they have income at or below 250% of the FPL. This
9 helps to ensure that no one with limited income would be terminated during the winter.

10

11 CAUSE-PA Statement No. 1-SR, Surrebuttal Testimony of Harry Geller

12 **Q. CAUSE-PA WITNESS GELLER STATES THAT THE COMPANY PROMPTLY**
13 **RETURNED SECURITY DEPOSITS THAT WERE HELD FOR CONFIRMED**
14 **LOW-INCOME CUSTOMERS; HOWEVER, HE RECOMMENDS THAT THE**
15 **COMPANY AUTOMATICALLY REVIEW ITS ACCOUNTS AT LEAST ONCE**
16 **EVERY SIX MONTHS TO MAKE SURE IT IS NOT HOLDING SECURITY**
17 **DEPOSITS FOR SUCH CUSTOMERS. (CAUSE-PA St. No. 1-SR, pp. 18-19.)**
18 **WOULD YOU PLEASE RESPOND?**

19 A. I believe that Mr. Geller's recommendation is a reasonable solution. Therefore, the
20 Company accepts and will implement his recommendation.

21

22 **Q. CAUSE-PA WITNESS GELLER ALSO MAKES CERTAIN**
23 **RECOMMENDATIONS CONCERNING THE INFORMATION THAT**

1 **CUSTOMER SERVICE REPRESENTATIVES PROVIDE TO CUSTOMERS**
2 **ABOUT PAYING THE CURRENT UNDISPUTED CHARGES WHILE A**
3 **MEDICAL CERTIFICATE IS ACTIVE. (CAUSE-PA St. No. 1-SR, pp. 19-24.)**
4 **WOULD YOU PLEASE RESPOND?**

5 A. Mr. Geller reiterates his recommendation that “Peoples should update its training
6 materials and its standard medical certificate forms to accurately inform customers that
7 additional medical certificate renewals (beyond the first three) are available to customers
8 who continue to satisfy their duty to pay their undisputed ongoing current charges or
9 budget bill amount while protected by a medical certificate.” (CAUSE-PA St. No. 1-Sr,
10 p. 24.)

11 To be clear, during customer’s initial contact and then again when the medical
12 certificate is being processed, Peoples’ customer service representatives inform the
13 customer that he or she must pay the undisputed current charges or Budget Bill amount to
14 keep the medical certificate active. Peoples also tries to assist customers on an individual
15 basis, by having the Company’s Credit team reach out to each customer to discuss his or
16 her unique situation.

17 Nevertheless, Peoples will review and, if necessary, update the Company’s
18 training materials to help ensure the customer service representatives inform customers
19 about the ability to obtain another medical certificate renewal by paying the undisputed
20 current charges or Budget Bill amount.

21
22 **Q. DOES THIS CONCLUDE YOUR REJOINDER TESTIMONY?**

23 A. Yes.

Billing



Billing Cycle Tidbits

- Due Date is 20 days from date bill is mailed
- Regular monthly bill 26 – 35 days

Credits And Charges Since Your Last Bill	
Balance from last bill	\$38.02 CR
Payment on Dec 8, 2010 - Thank You	84.00 CR
Balance	\$102.02 CR
Current Charges	
Rate RS Residential	
Customer Charge - 1 Month	\$11.00
Delivery Charge	
12.2 MCF @ \$2.4948	30.43
Capacity Charge \$0.5318 per MCF	6.40
Commodity Charge \$5.2443 per MCF	63.98
Gas Cost Adjustment - \$0.2838 per MCF	3.46 CR
State Tax Surcharge Cr @ 1.96%	.80 CR
Total Current Charges	\$107.07
Total Account Balance	\$5.05

Reading the Meter

- Company attempts to read the meter at least every other month
- We cannot go more than six (6) estimated bills in a row without a read and no more than twelve (12) without an actual read. If read needed, we will start non-access termination process beginning with friendly request letters.
- Customers can enter a read through the IVR or through their e-Account

CSR

Levels of Authority

“Good Will” monetary adjustments:

- \$25 maximum
- Use discretion – adjustments are only given in special circumstances to satisfy the customer.
- Document well the reason for the adjustment. Also document the manager or supervisor that approved the adjustment if it was over \$25.

Allow LPC holds:

- Good Pay customers only



Budget Billing

- Based on 12 months of prior usage and weather conditions
- Billing the monthly average (annual cost divided by 12) allows customers to spread the cost of their natural gas throughout the year.
- Helps customers reduce the impact of winter heating bills (which can be 2 – 3 times the average bill)
- Budgets are adjusted for expected usage, weather, and rates, so the amounts will fluctuate. For this reason, budgets are reviewed routinely.
- There are two types of budget billing:
 - **Regular budget** (reviewed quarterly)
 - **Flat budget** (reviewed at end of budget year, i.e., after 12 months)
- Budget billing may start with the:
 - Current bill OR
 - Next bill
- **Exceptions:**
 - If the account balance is **LESS than the Budget amount**, the **NEXT BILL** option must be selected.
 - If the account balance is **\$300 or more**, **budget billing is not available**. Explore other applicable options, such as a Payment Arrangement or CAP.

Important: The budget amount is not a guaranteed level or limit on the gas bills.

The Residential Budget Formula is . . .

Annual MCF / 12 x Current Rates + Customer Charge = Budget (rounded to the nearest dollar)

Example

MCF 12 month total	119.8
Divide by 12 =	10.0
Times current rate	\$9.3449
Plus monthly service charge	\$13.95
Rounded =	\$107.00

Budget plans are based on historic usage. If usage is not available, it will be based on the usage of a similar dwelling.

* 1. Overall, how would you rate your experience with our Customer Service Center?

- Positive Negative
 Neutral

Comments

2. How well did the Customer Service Representative address your questions and concerns?

- Extremely well Not well at all
 Somewhat well

Comments

3. How much time did it take us to resolve the reason for your call?

- Exceeded expectations Below expectations
 Met expectations

Comments

4. Did the Customer Service Representative mention:

(Check as many as apply)

- E-Account Peoples Protection Program
 E Bills Customer Assistance Program
 Budget Billing

5. Any additional comments, questions, or concerns are appreciated. Please enter in this comment box.
Thank you!

6. If you would like Peoples to follow up with you regarding your feedback, please provide your contact information below.

Name

Company

Address

Address 2

City/Town

State/Province

ZIP/Postal Code

Email Address

Phone Number