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April 24, 2024

**VIA ELECTRONIC MAIL**

Luly E. Massaro, Commission Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

**RE: Docket No. 3628 – The Narragansett Electric Company d/b/a Rhode Island Energy’s  
Proposed Revisions to the Electric Service Quality Plan  
Responses to Division Data Requests – Set 1 (Complete Set)**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy<sup>1</sup>, I have enclosed the Company’s complete set of responses to the Division of Public Utilities and Carriers First Set of Data Requests in the above-referenced matter.

Thank you for your attention to this matter. If you have any questions, please contact me at 401-316-7429.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Jennifer Brooks Hutchinson".

Jennifer Brooks Hutchinson

Enclosure

cc: Docket No. 3628 Service List

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<sup>1</sup> The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”).

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Division 1-1

Request:

Please describe in detail RIE's process and procedures for answering and following up customers' telephone calls. Provide all written protocols.

Response:

The Rhode Island Energy Call Center is open 24 hours per day, seven (7) days per week, 365 days per year to answer emergency calls from gas and electric customers. Rhode Island Energy has dedicated phone numbers customers can use when reporting emergencies:

Gas: [1-800-640-1595](tel:1-800-640-1595)

Electric: [1-855-743-1102](tel:1-855-743-1102)

Upon calling these numbers, customers select the Emergency Prompt within the interactive voice response (IVR) system and then report their emergency.

Excluding holidays, the following schedule is in place to handle non-emergency calls:

*Billing Operating Hours: Monday-Friday, 7:00am to 7:00pm*

*Credit & Collections Operating Hours: Monday – Friday, 7:00am to 7:00pm; Saturday 7:00am – 5:00pm*

There are no formal written protocols; however, if a customer requires a follow up, an agent will follow the escalation process as described in Attachment DIV 1-1.

## **Escalation Process**

### **Initial Assessment:**

- The frontline agent receives the REPEAT call and conducts an initial assessment to understand the nature and severity of the issue.
- If possible, the agent attempts to resolve the issue directly. If the agent cannot resolve the issue and fix it on that call, the call is escalated to a Team Lead or sent to the call back box if no one is available.
- Fixing the repeat issue=satisfied customer. We do not want you to issue another wfm or send another email to a department for follow-up.

### **Tier 1 Escalation (Team Lead):**

- The Tier 1 specialist (Team Lead) reviews the details of the call and attempts to resolve the issue using their expertise and additional resources.
- If it can be fixed same day but will require additional time to process, they will own the call and fix the issue and call the customer back same day.

### **Tier 2 Escalation (Supervisor):**

- The Tier 2 support team (Supervisor) receives escalated callback that cannot be resolved at the Tier 1 level, especially if the customer is a repeat caller and threatening PUC or Attorney.
- Supervisors will review to see if anything further can be done to assist the customer and close out the issue.

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Division 1-2

Request:

Other than they are not part of the Commission's Open Meeting Decision for Dkt. 22-49-EL or the existing Service Quality ("SQ") Plan, please explain why the Company would be opposed to devising and adopting the following service quality metrics:

- a. Incoming Call Responsiveness:
  - (i) % of Calls Answered by a Live Agent During Normal Business Hours; and
  - (ii) Call Abandonment Rate;
- b. Customer Service Appointments Kept:
  - (i) 4-hour and All-Day Windows; and
  - (ii) Same Day Requested;
- c. Customer Complaint Responsiveness;
- d. Billing Accuracy;
- e. CKAIID; and
- f. CKAIIF.

Response:

The Company is not opposed to discussing and potentially adopting the above service quality metrics but believes such changes should be part of a holistic review of the service quality program in a separate docketed proceeding. The Company does not believe it is appropriate to devise and adopt such metrics in isolation. As the Commission said in Order No. 18294, the "general purpose of a service quality program is to ensure that ratepayers receive a reasonable level of service." The existing service quality metrics were developed after an assessment of what constituted a reasonable level of service and established to ensure the Company achieves that overall level of service quality. Those metrics have effectively driven the Company's performance since they were adopted, as the Company explains in its response to Division 1-6. Similarly, the new metrics currently under consideration were directed by the Commission as part of the implementation of advanced metering functionality (AMF) to ensure that the deployment of AMF did not result in an unreasonable level of service in light of the AMF investment after a lengthy proceeding that evaluated the costs, benefits, and risks of that implementation, including how they will impact service to customers. If additional service quality metrics (like those identified in this data request) were to be developed, it would be

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appropriate to conduct a comprehensive review of how each metric relates to overall service quality and determine whether each category of metric is appropriate, how they relate to existing metrics and to each other in driving overall service quality, and what the appropriate penalties and potential offsets are for each metric to drive the desired action from the Company if, in fact, each such metric is necessary and appropriate.

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Division 1-3

Request:

Please identify the metrics, years and amounts for which RIE has been penalized “five times since 2005.” (See Gill and Walnock at 46).

Response:

The table below compiles penalties and offsets incurred by the Company from 2005-2022.

The Company incurred a penalty in years 2005, 2010, 2011, 2012, and 2015. The Company did not meet its target for one or more metrics in 2005, 2010, 2011, 2012, 2013, 2014, and 2015.

The Company obtained this data from annual Service Quality Reports filed with the Public Utilities Commission in Docket No. 3628 and available here:

<https://ripuc.ri.gov/eventsactions/docket/3628page.html>.

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<b>(a) Year</b>	<b>(b) SAIFI</b>	<b>(c) SAIDI</b>	<b>(d) Survey</b>	<b>(e) Calls</b>	<b>(f) Net =(b)+(c)+(d)+(e)</b>	<b>(g) Net Assessed =min((f),0)</b>
2005	\$ -	\$ (192,535.00)	\$ -	\$ 17,577.00	\$ (174,958.00)	\$ (174,958.00)
2006	\$ -	\$ -	\$ 4,000.00	\$ 2,992.00	\$ 6,992.00	0
2007	\$ -	\$ -	\$ -	\$ -	\$ -	0
2008	\$ -	\$ -	\$ 34,000.00	\$ -	\$ 34,000.00	0
2009	\$ 30,533.00	\$ -	\$ -	\$ -	\$ 30,533.00	0
2010	\$ (162,062.00)	\$ (224,929.00)	\$ -	\$ -	\$ (386,991.00)	\$ (386,991.00)
2011	\$ -	\$ -	\$ (184,000.00)	\$ -	\$ (184,000.00)	\$ (184,000.00)
2012	\$ -	\$ -	\$ (16,000.00)	\$ -	\$ (16,000.00)	\$ (16,000.00)
2013	\$ 229,000.00	\$ -	\$ (184,000.00)	\$ -	\$ 45,000.00	0
2014	\$ 152,667.00	\$ -	\$ (144,000.00)	\$ 3,366.00	\$ 12,033.00	0
2015	\$ -	\$ -	\$ (184,000.00)	\$ -	\$ (184,000.00)	\$ (184,000.00)
2016	\$ -	\$ -	\$ -	\$ -	\$ -	0
2017	\$ 164,695.00	\$ -	\$ -	\$ -	\$ 164,695.00	0
2018	\$ -	\$ -	\$ -	\$ -	\$ -	0
2019	\$ -	\$ -	\$ -	\$ -	\$ -	0
2020	\$ -	\$ -	\$ -	\$ -	\$ -	0
2021	\$ -	\$ -	\$ -	\$ -	\$ -	0
2022	\$ -	\$ -	\$ -	\$ -	\$ -	0

Notes: Table includes years the Company reviewed and considered when developing its current proposed update to the Service Quality Plan; the 2023 Service Quality Report was not available at this time.

Prepared by or under the supervision of: Carrie Gill and Philip Walnock

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Division 1-4

Request:

Please explain in further detail why RIE believes “the electric revenue decoupling mechanism (‘RDM’) is the appropriate equivalent to ‘electric distribution revenue’ pre Revenue Decoupling Act.” (See Gill and Walnock at 46).

Response:

Rhode Island Energy believes the electric revenue decoupling mechanism (‘RDM’) is an appropriate equivalent to “electric distribution revenue” because the electric revenue decoupling mechanism is defined as “Actual Billed Distribution Revenue,” which is the amount the Company has billed during the applicable RDM year for customer charges, distribution demand charges, distribution energy charges, second feeder service charges, and any other charges or discounts that the Company records as distribution revenue. It would not include commodity, supply, and/or any miscellaneous costs that the Company believes are not associated with its reliability and customer service metrics. The electric revenue decoupling mechanism is the main revenue component that supports the Company’s cost of service.

Furthermore, in accordance with R.I. Gen. Laws § 39-1-27.7.1 (the “Decoupling Act”), the revenue decoupling mechanism serves the purpose of achieving the goals established in the electric distribution company’s plan for system reliability and reducing risks for both customers and the electric distribution company including, but not limited to, societal risks, weather risks and economic risks. Therefore, the Company believes that the purpose of the revenue decoupling mechanism is in line with the proposed service quality plan.



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Division 1-5

Request:

Please provide the SQ Plans that exist for, and/or SQ metrics or requirements that apply to, the Company's affiliate operations in Kentucky and/or Pennsylvania.

Response:

The Company's affiliates in Kentucky and Pennsylvania are not required to prepare and submit service quality plans. In Pennsylvania, public utilities are regulated by the Pennsylvania Public Utility Commission ("PA PUC") pursuant to the Public Utility Code. *See* 66 Pa. C.S. § 501 (general powers of the PUC to regulate), and § 1501 (duty of public utilities to provide reasonable service). In lieu of service quality plans, the PA PUC has promulgated regulations regarding the service quality of electric distribution companies in Title 52, Chapters 56 and 57 of the Pennsylvania Code. For example, the electric reliability standards (SAIDI/SAIFI/CAIDI) are set forth in Chapter 57, subchapter N, which are subject to investigation and enforcement by the PA PUC. These regulations are available at the following links:

[52 Pa. Code Chapter 56. Standards And Billing Practices For Residential Public Utility Service \(pacodeandbulletin.gov\)](https://www.pacodeandbulletin.gov/52-Pa-Code-Chapter-56-Standards-And-Billing-Practices-For-Residential-Public-Utility-Service)

[52 Pa. Code Chapter 57. Electric Service \(pacodeandbulletin.gov\)](https://www.pacodeandbulletin.gov/52-Pa-Code-Chapter-57-Electric-Service)

In lieu of service quality plans in Kentucky, the Kentucky Public Service Commission ("KPSC") has exercised the authority delegated to it by the Kentucky General Assembly in KRS § 278.280 over utility service to promulgate regulations with standards for providing electric service. The KPSC's authority over service is extensive and extends to "the rules, regulations, practices, equipment, appliances, facilities or service of any utility subject to its jurisdiction, or the method of manufacture, distribution, transmission, storage or supply employed by such utility[,]" allowing the KPSC to determine whether such actions "are unjust, unreasonable, unsafe, improper, inadequate or insufficient[,]" and if so, empowering the commission to determine "the just, reasonable, safe, proper, adequate or sufficient rules, regulations, practices, equipment, appliances, facilities, service or methods to be observed, furnished, constructed, enforced or employed" by the utility and the authority to "fix" the same by order or regulation. The KPSC has enacted numerous service quality standards in 807 KAR 5:041, including requirements for the maintenance or continuity of service, voltage and frequency, servicing utilization control equipment and measuring customer service. These requirements are available at the following links:

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[Kentucky Revised Statutes § 278.280 \(2022\) - Orders by commission as to service -- Extension of service :: 2022 Kentucky Revised Statutes :: US Codes and Statutes :: US Law :: Justia](#)

[Title 807 Chapter 5 Regulation 041 • Kentucky Administrative Regulations • Legislative Research Commission](#)

Although the KPSC has not established a benchmark for judging the performance of circuits operated by a particular utility or the performance of one utility to another, each utility is required to file an annual reliability report with the KPSC.

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Division 1-6

Request:

For each metric, SAIDI, SAIFI, Customer Contact Survey and Telephone Calls Answered within 20 Seconds, please explain how the proposed penalty threshold is in keeping with the SQ Plan principle that *“penalties and incentives should be designed to reflect acceptable levels of risk and reward. Specifically, inappropriate penalty and reward thresholds that ensure the utility will always exceed or never achieve specified targets can discourage the company and harm customers,”*<sup>1</sup> in view of the fact that the Company has incurred only five service quality performance penalties since 2005 and no penalties since 2016.

Response:

The Company does not propose any change to SAIDI, SAIFI, Customer Contact Survey, or Telephone Calls metrics. Those existing metrics exemplify the excerpted principle because the Company has incurred both penalties and offsets for each of those metrics since they were adopted in 2005 (please see the Company's response to Division 1-3 for a compilation of penalties and offsets incurred from 2005-2022). That the Company has not incurred any penalty since 2016, does not lead to the conclusion that this principle is not met; rather, the evidence from the commencement of the existing Service Quality Plan shows the Company refined its operations to meet the targets over the course of 2005 to 2015 and has been successful since in consistently meeting the targets.

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<sup>1</sup> Hanser, Sappington and Zarakas, *Review and Analysis of Service Quality Plan Structure* at 3 (March 2013).

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Division 1-7

Request:

Please explain in detail how RIE “concluded” and “reconfirmed its internal concurrence” that this level of plan maximum penalty (*i.e.*, one percent of electric distribution revenues) is a sufficient deterrent against declining service quality. (See Gill and Walnock at 46). Provide all documents utilized to support the Company’s conclusion and reconfirmation of its internal concurrence.

Response:

Rhode Island Energy concluded and reconfirmed its internal concurrence that one percent of electric distribution revenues is a sufficient deterrent against declining service quality via internal discussion based on two points.<sup>1</sup>

First, the Company reviewed the history contained within Docket No. 3628. The Direct Testimony of Robert H. McLaren filed August 2, 2004, describes the Company’s 2000 Settlement and the associated Service Quality Plan (“Original SQ Plan”) as approved in Docket No. 2930 in 2000. The maximum service quality penalties equaled “about 1.1% of the Company’s distribution revenues, while the potential maximum offsets represent[ed] about 0.8% of distribution revenues” (Direct Testimony of McLaren, page 5 of 15 at lines 8-10).

The Company and parties proposed revisions in 2005. Order No. 18294, issued July 12, 2005, found,

As for the penalty amount, the proposed SQP allows for \$2.2 million which is approximately 1% of Narragansett Electric’s distribution revenues and is very similar to the \$2.4 million or 1.1% of Narragansett Electric’s overall service quality during the rate freeze period of 2000 through 2004. A maximum annual penalty of \$2.2 million should be a sufficient deterrent to Narragansett against declining service quality. (Order No. 18294 at 11)

Although this 2005 order approved a proposed decrease in maximum offset relative to maximum penalty (“[f]ourth, the maximum potential offset for penalty would be 25% of the maximum penalty for that metric rather than 75% under the current [Service Quality Plan].” Order No. 18294 at 7), the order maintains the overall level of plan maximum penalty and affirms that the plan maximum penalty is adequate.

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<sup>1</sup> As such, there are no documents to provide in response to Data Request Division 1-7.

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Subsequent updates to the service quality plan in 2007 and 2016 did not contemplate changes to the plan maximum penalty or relative level of offset, nor did it question the sufficiency of the plan maximum penalty. The Company interpreted this history as general alignment with the benchmark that one percent of electric distribution revenues is reasonable.

Second, the Company did not identify any other events – besides the passage of the 2010 Revenue Decoupling statute, which the Company addressed by tying the plan maximum penalty to the Revenue Decoupling Mechanism – that would suggest prior historical reasoning should no longer apply to present day or that the Company's present-day circumstance is different than prior work. Therefore, the Company found no reason to change the benchmark of one percent of electric distribution revenues as the benchmark for the plan maximum penalty.

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d/b/a Rhode Island Energy  
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Division 1-8

Request:

Other than it is not part of the Commission's Open Meeting Decision for Dkt. 22-49-EL, please explain in detail why RIE would be opposed to adopting a more up-to-date and comprehensive SQ Plan such as that adopted by National Grid in Massachusetts in the accompanying Exhibit 1.

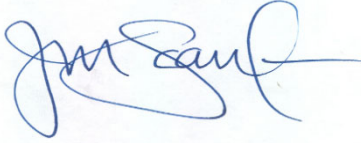
Response:

Please see the Company's response to Division 1-2. The Company is not opposed to considering additional updates to the Service Quality Plan in the context of an appropriate, more holistic docketed proceeding.

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



\_\_\_\_\_  
Joanne M. Scanlon

April 24, 2024  
Date

**Rhode Island Energy – Electric Service Quality Plan – Docket 3628 Service List Updated 4/15/2024**

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