

Staff Briefing Papers

Meeting Date October 22, 2020 Agenda Item *4

Company Otter Tail Power Company

Docket No. **E017/M-18-380**

In the Matter of Otter Tail Power Company's Petition for Approval of Tariff Changes to Facilitate Implementation of A New Customer Information System

Issues What action should the Commission take on the recommendation to cease periodic reports that track inquiries related to the company's CIS implementation?

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The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.

 **Relevant Documents**

	Date
Order, Commission	September 20, 2018
Compliance Filing, Otter Tail Power Company	August 30, 2019
Compliance Filing, Otter Tail Power Company	November 18, 2019
Compliance Filing, Otter Tail Power Company	February 21, 2020
Comment Notice, Commission	March 3, 2020
Comments, The Department of Commerce, Division of Energy Resources	March 18, 2020
Compliance Filing, Otter Tail Power Company	March 26, 2020
Compliance Filing, Otter Tail Power Company	September 16, 2020

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I. Statement of the Issue

What action should the Commission take on the recommendation to cease periodic reports that track inquiries related to the company's CIS implementation?

II. Background

Otter Tail Power Company submitted a Petition in June of 2018 regarding tariff changes to facilitate their new Customer Information System (CIS).

On September 3, 2018, the item came before the Commission and was approved with the requirement that the Company track and report customer complaints and inquiries related to the proration of the Company's customer charge.¹

Subsequent to education efforts to increase customer knowledge of the prorated customer charge, the Company filed four compliance reports indicating the number of complaints and

¹ Please see Order Point 3 *In the Matter of Otter Tail Power Company's Petition for Approval of Tariff Changes to Facilitate Implementation of A New Customer Information System*, PUC Docket No. E017/M-18-380, [ORDER](#) (September 20, 2018).

inquiries received from February of 2019 to June of 2020.² As the table below indicates, over sixteen months, there were no complaints received and sixteen inquiries.

Report Date	Complaints Received	Inquiries Received
August 30, 2019	0	2
November 18, 2019	0	2
February 21, 2020	0	11
September 16, 2020	0	1

The September 20, 2018 Order did not provide an end date to the customer inquiry-complaint reporting. Commission staff was contacted by Otter Tail Power inquiring about the reporting requirement given the low level of customer concern demonstrated in the three reports. Commission staff determined that based on the reported data, very few customers were contacting the Company for issues related to the customer charge or bill appearance. Therefore, the reporting requirement fulfilled its intent in monitoring the utility-customer interaction related to these issues and, unless there were to be a sudden increase in either complaints or inquiries, streamlining this reporting requirement would be helpful.

On March 3, 2020, Commission staff filed a comment notice recommending the termination of these periodic compliance reports and, instead, migrating this requirement to the Company's annual safety, service reliability, and service quality report if Otter Tail Power receives five or more complaints related to the pro-rated customer charge during any calendar quarter.

On March 18, 2020, the Department of Commerce filed comments agreeing that customers had no significant concerns regarding the proration of the customer charge as only a few inquiries and no complaints were received from an approximate customer base of 62,000.³

On March 26, 2020, Otter Tail Power submitted comments agreeing with the staff proposal and replying to the Department's question on the nature of the customer inquiries received and how they were resolved.

III. Parties' Comments

As described above, all parties agree that ceasing compliance closures in this docket and moving this report into the annual service quality report would simplify efforts.⁴ However, the Company proposed that such reporting conclude after December 31, 2021.⁵ The Department

² The August 30, 2019 compliance filing covered the period from implementation on February 4, 2019 through June 30, 2019. The November 18, 2019 compliance filing covered the period from July 1, 2019 through September 30, 2019. The February 21, 2020 compliance filing covered the period from October 1, 2019 to December 31, 2019. The September 16, 2020 compliance report covers January 1, 2020 to June 30, 2020.

³ Department of Commerce, Comments at 1 (March 18, 2020).

⁴ When there are five or more complaints or inquiries received within a calendar quarter.

⁵ Otter Tail Power, [Comments](#) at 2 (March 26, 2020).

did not have the opportunity to address the proposed deadline as it was suggested in reply comments.

In an effort to complete the record, the Department questioned how Otter Tail Power responded to the inquiries and underscored that Otter Tail Power's customers always have access to the Commission's Consumers Affairs Office if any issues were to arise.⁶

The Company responded to the Department that the inquiries received fell into two general categories: general questions regarding proration and concerns about the appearance of the bill.⁷ "Customers identified that something looked different and that led to the inquiry."⁸ Finally, Otter Tail Power assured that customer service representatives responded to each customer by explaining the purpose of the changes and how they were presented on the bill.⁹

IV. Staff Analysis

The reports were established by the Commission and served as a window into the Company's customer engagement during the implementation of their CIS and a change to their historical billing method. As the reports indicate, the Company received no complaints and less than twenty inquiries. Given that the Company received so few inquiries – less than .001% – and zero complaints, staff believes that continued tracking and the compliance closures are no longer needed. As a safeguard, staff suggested migrating this to the service quality filings if there is an unexpected increase (five or more) in customer complaints or inquiries. Staff welcomes the Company's suggestion to sunset this reporting transferal by December 31, 2021 if nothing has been received.

Finally, as noted by the Department, customers have access to not only customer service agents at Otter Tail Power, but also the Consumer Affairs Office at the Commission for concerns.

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⁶ Department of Commerce, Comments at 2 (March 18, 2020).

⁷ Otter Tail Power, [Comments](#) at 1 (March 26, 2020).

⁸ *Id.*

⁹ *Id.*

V. Decision Options

1. Require the Company to continue tracking customer complaints and inquiries and filing periodic reports established in the September 18, 2019 order.

OR

2. Modify the reporting requirement established in the September 18, 2019 order
 - a) Migrate reporting to the annual service quality report if Otter Tail Power Company receives five or more complaints related to the pro-rated customer charge during any calendar quarter (*The Department*)
 - b) Cease reports after December 31, 2021 (*Otter Tail Power*)

AND/OR

3. Make some other finding