Department of Telecommunications and Energy
Second Set of Information Requests

THE BERKSHIRE GAS COMPANY

D.T.E. 04-13

Witness: **Richard E. Nasman**
Date Filed: **September 16, 2004**

Question
DTE 2-1: Please explain why ten years of historical data is not available for the following SQ penalty measures: Telephone Answering; and Meter Reads.

Response: First, with respect to Telephone Answering, there is no telephone answering data prior to 1998. From January 1998 through July 2000, the Company had no automated attendant to separate emergency and non-emergency calls from the call stream, and, therefore, no breakdown of this data is available. Starting in August 2000 and continuing through to the present, emergency and non-emergency calls were separated through the use of an auto-attendant system which allowed such calls to be separated. The standard of service utilized by the Company during this period for emergency calls was 40 seconds and for non-emergency calls was 45 seconds. Also during this period emergency and non-emergency calls answered in 20 seconds was added to the 40 and 45 second parameters stated above. This process of tracking additional calls for the 20 second standard created additional telephone system reporting requirements which was not an inherent functional ability of the Company's phone system previously. Starting in January 2001 the Company commenced maintaining reporting Telephone Answering reporting data consistent with the requirements required in such order.

An additional factor during some of these earlier periods was that the Company was not only unable to distinguish between emergency and non-emergency calls but was also unable to distinguish between utility and non-utility service calls with the phone system installed at that time. Certain non-regulated utility affiliates and divisions of the Company shared a phone system whose costs were allocated between these operations. Thus, the Company data on telephone response time was not meaningful or appropriate for regulated utility service quality standards until at least January 2001. The Company had investigated the merits of collecting some limited call information dating as far back as 1998. To the extent this data was available, it was presented in the Company's last base rate proceeding and demonstrated that a variety of calls were tracked under different standards as the Company's own and relevant regulatory standards evolved. Subsequently, over time, non-utility calls were removed from the tracking system and since January 2001 only utility service calls have been tracked. The Company explained in these earlier regulatory proceedings that it would have three years of consistent and meaningful utility telephone response data consistent with the requirements of D.T.E. 99-84 by the end of 2003. The Company's 2003 service quality report confirmed that the Company had satisfied this earlier commitment.

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Cont'd:

Second, in terms of Meter Reading, this issue was also explored in the course of the Company's base rate proceeding. In the late 1990's, the Company completed two major enhancements of its information systems. First, a substantial and comprehensive automated Meter Reading installation program was completed. Second, the Company converted and enhanced several information systems associated with its customer information programs. Substantial training efforts were applied for the Company's customer services representatives. The Company believes that estimated billing data from the period is not representative and would not be useful in terms of establishing a benchmark for utility purposes. As the Company explained in the course of the rate case, only a single additional year of data was required to establish a meaningful standard consistent with the D.T.E. 99-84 Guideline, and beginning in 2003, the Company established a performance standard for this measure which, coincidentally, was a higher and more rigorous standard that would have been established had this older more questionable data been applied into the establishment of a Meter Reading standard.