

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 21-4060-PET

Petition of Consolidated Communications of)
Vermont Company, LLC and Consolidated)
Communications of Northland Company for)
approval of a successor Incentive Regulation)
Plan, pursuant to 30 V.S.A. § 226b)

**PREFILED REBUTTAL TESTIMONY OF
CAROL FLINT
ON BEHALF OF THE
VERMONT DEPARTMENT OF PUBLIC SERVICE**

April 14, 2022

Summary: Ms. Flint's rebuttal testimony responds to Consolidated's position on additional service quality reporting for Emergency Households and modifies the Department's recommendation.

REBUTTAL TESTIMONY OF CAROL FLINT

Q1. Please state your name and title.

A1. My name is Carol Flint. I am Director of Consumer Affairs and Public Information for the Vermont Department of Public Service (“Department”).

Q2. Are you the same Carol Flint who submitted prefiled direct testimony in this proceeding?

A2. Yes, I am. My prefiled direct testimony was submitted in this proceeding on January 21, 2022.

Q3. What is the purpose of your rebuttal testimony in this case?

A3. My rebuttal testimony modifies the Department’s recommendation with respect to Emergency Households.

Q4. Do you agree with Consolidated that there is no reason to change the status quo for Emergency Households?

A4. No. I recommended a new metric for Emergency Households to provide vulnerable customer households with enhanced protections because of the potential for deregulation of competitive/Tier 2 municipalities. Should deregulation occur in such areas, the Department will want to monitor troubles to be sure that they are cleared as quickly as possible for such vulnerable customers.

1 **Q5. Has your recommendation regarding Emergency Households changed?**

2 A5. Yes. Because Consolidated has, so far as those known of or reported to CAPI,
3 adequately addressed troubles for Emergency Households, I now recommend the
4 following reporting metric in lieu of a troubles cleared metric.

5
6 **Emergency Household Trouble Report Rate:** this performance area measures
7 customer trouble reports to Consolidated. It includes service-affecting troubles caused
8 by telephone plant conditions and central office conditions. This metric includes:

- 9
 - service affecting troubles caused by outside plant conditions;
 - 10 • central office conditions;
 - 11 • found OK in the central office;
 - 12 • found OK in outside plant attributable to the network; and
 - 13 • those troubles found OK prior to dispatching a technician.

14 The rate does not include:

- 15
 - reports relating to customer premise equipment;
 - 16 • special services;
 - 17 • interexchange carrier access services; or
 - 18 • subsequent reports on an existing trouble.

19 The rate is calculated by dividing the number of combined Emergency Households
20 troubles reported by the number of Consolidated access lines servicing Emergency
21 Households, then multiplying the result by 100. The rate is compiled monthly with
22 results reported quarterly to the Department and the Public Utility Commission. The

1 base line standard shall be 2 and the action level 4. Consolidated shall modify its
2 service quality report and its reporting template accordingly.

3
4 BASELINE STANDARD: The rate shall not exceed an average of 2 troubles per 100
5 access lines per month.

6 ACTION LEVEL REPORT: The rate shall not exceed 4 troubles per 100 access lines.

7
8 **Q6. Does this conclude your testimony?**

9 **A6. Yes.**