

J Elias

Exhibit DPS-CMF-1

STATE OF VERMONT
PUBLIC SERVICE BOARD

Docket No. 8231

Investigation into Proposed Revisions to Green)
Mountain Power Corporation's Service Quality and)
Reliability Performance, Monitoring and Reporting Plan)

2014 JUL 24 P 3:54
STATE OF VERMONT
DEPT OF PUBLIC SERVICE
MONTPELIER, VT.
05620-2601

Order entered:

7/23/2014

ORDER APPROVING MODIFICATIONS TO SERVICE QUALITY PLAN

I. INTRODUCTION

On January 25, 2013, the Public Service Board ("Board") approved a revised Service Quality and Reliability Performance, Monitoring and Reporting Plan ("Service Quality Plan") for Green Mountain Power Corporation ("GMP") that integrated the service quality standards of the former Central Vermont Public Service Corporation ("CVPS") service territory and the legacy GMP service territory.¹ In that Order, the Board required GMP to file with the Board the results of the review of the Service Quality Plan to be conducted by GMP and the Vermont Department of Public Service ("DPS") pursuant to Section I.3 of the Service Quality Plan.²

On June 16, 2014, GMP filed a proposed revised Service Quality Plan ("Revised Service Quality Plan") that was based on GMP's and the DPS's joint review of the current Service Quality Plan.³ The proposed changes: (1) modify the call answering performance measures (Performance Standards III.1.a through III.1.d) reflecting the conversion of GMP's phone systems to a single system; (2) simplify Performance Standard III.2.b (Bills Found Inaccurate) by incorporating exclusions allowed by tariff; and (3) lower the baseline for Performance Standard III.3 (Percentage of Actual Meter Readings Per Month)⁴ and clarify that this performance

1. In this Order, "legacy GMP" is used to refer to GMP's service territory before the merger with CVPS. "GMP" or "Combined Company" is used to refer to the company after the merger with CVPS.

2. Docket 7770, Order of 1/25/13 at 11 (Order paragraph 6).

3. On July 22, 2014, GMP filed a corrected version of the Revised Service Quality Plan that includes the modification of the baseline for one performance standard that the Board approved in its April 21, 2014, Order in this proceeding.

4. For Performance Standard III.3, lower numbers reflect better performance.

measure includes all meter types. According to GMP's letter, the DPS supports the proposed revisions.

In this Order, we approve the Revised Service Quality Plan, as filed on July 22, 2014, and determine that it will take effect retroactively on April 1, 2014. We also require GMP to file a corrected version of the Revised Service Quality Plan that fixes an error in the reference to the date of GMP's current Terms and Conditions Tariff.

II. PROCEDURAL HISTORY

The early procedural history in this proceeding can be found on page 2 of our April 21, 2014, Order in this proceeding, and need not be repeated here.

On June 16, 2014, GMP filed the Revised Service Quality Plan and a redline/strikeout document comparing the Revised Service Quality Plan with GMP's current Service Quality Plan. The Revised Service Quality Plan and the redline/strikeout document are admitted into evidence in this proceeding as Exhs. GMP-2 and GMP-3, respectively.⁵

On June 26, 2014, GMP filed a letter proposing an effective date of April 1, 2014, for the Revised Service Quality Plan. GMP's letter states that the DPS supports the proposed effective date.

On July 22, 2014, GMP filed a corrected version of the Revised Service Quality Plan that includes the modification of the baseline for one performance standard that the Board approved in its April 21, 2014, Order in this proceeding.

III. FINDINGS

1. Under the Revised Service Quality Plan, Performance Standards III.1.a (Call Answering Service Level) and III.1.b (Abandon Rate, Normal Business Hours) will be measured using a single source of data, instead of one source of data for the legacy GMP service territory and another source of data for the legacy CVPS service territory. Exh. GMP-2 at 5-6; exh. GMP-3 at 5-6.

5. Any objections to the admission of the Revised Service Quality Plan or the redline/strikeout document into evidence should be included in a motion for reconsideration of this Order.

2. Under the Revised Service Quality Plan, Performance Standard III.1.c (Outage Calls Not Answered) will be measured throughout GMP's service territory, instead of only in the legacy GMP service territory. Exh. GMP-2 at 6; exh. GMP-3 at 6.

3. The Revised Service Quality Plan does not include Performance Standard III.1.d (Abandon Rate, After Normal Business Hours), which had been measured only in the legacy CVPS service territory. Exh. GMP-3 at 6-7.

4. Under the Revised Service Quality Plan, Performance Standard III.2.b (Bills Found Inaccurate) is simplified by incorporating exclusions allowed by GMP's Terms and Conditions tariff. Specifically, Performance Standard III.2.b now reflects that GMP's Terms and Conditions tariff allows GMP to estimate bills for up to two consecutive billing cycles. Exh. GMP-2 at 7; exh. GMP-3 at 7-8.

5. Under the Revised Service Quality Plan, Performance Standard 2.b (Bills Found Inaccurate) will consider multiple bills for a customer that are caused by the same error to be one incident for up to two billing cycles, after which they will be counted as individual incidents each billing cycle. Previously there was no limit on the number of multiple bills for a customer that are caused by the same error that would be considered one incident. Exh. GMP-3 at 7-8.

6. The Revised Service Quality Plan lowers the baseline for Performance Standard III.3 (Percentage of Actual Meter Readings Per Month) from three percent to one percent. Exh. GMP-2 at 8; exh. GMP-3 at 8.

7. The Revised Service Quality Plan clarifies that Performance Standard III.3 (Percentage of Actual Meter Readings Per Month) applies to all meter types. Exh. GMP-2 at 8; exh. GMP-3 at 9.

IV. DISCUSSION

Our authority to approve service quality plans stems from 30 V.S.A. §§ 209(a)(1), 209(a)(3), and 219. As we stated in our Order approving a service quality plan for CVPS:

Section 219 of Title 30 requires electric utilities (and other regulated companies) to "furnish reasonably adequate service, accommodation and facilities to the public." Vermont law gives this Board the authority to set standards regarding this utility obligation. Specifically, 30 V.S.A. § 209(a)(1) gives this Board jurisdiction over "[t]he . . . quality of any product furnished or sold by any company subject to supervision under this chapter," and 30 V.S.A. § 209(a)(3) provides jurisdiction

over "[t]he manner of operating and conducting any business subject to supervision under this chapter, so as to be reasonable and expedient, and to promote the safety, convenience and accommodation of the public[.]" Taken together, these statutory provisions establish the basis for service quality and reliability standards by which the adequacy of service can be measured in order to determine whether a company is, in fact, providing "reasonably adequate service" and is operating its business in a "reasonable and expedient" manner that "promotes the safety, convenience, and accommodation of the public."⁶

After reviewing the proposed Revised Service Quality Plan, we conclude that the modifications proposed therein do just that — they enable the Board to measure GMP's performance in certain areas that are important to customers, and thus to ascertain whether GMP is providing "reasonably adequate service." Thus, the Revised Service Quality Plan will help the Board monitor whether GMP's performance is consistent with its statutory obligations.

Turning to the specific modifications, it is appropriate for GMP's call-answering performance standards to be modified to reflect the conversion of GMP's phone systems to a single system. This conversion was expected as a result of the merger of legacy GMP and CVPS.

It is also appropriate to limit the number of multiple bills caused by the same error that can be counted as one incident under Performance Standard III.2.b (Bills Found Inaccurate) to up to two billing cycles. This modification benefits customers by "tightening" the performance standard since currently there is no limit on the number of multiple bills to a customer that would be counted as one incident.

It is helpful to simplify Performance Standard III.2.b (Bills Found Inaccurate) by incorporating the fact that GMP's current Terms and Conditions tariff allows GMP to estimate bills for up to two consecutive billing cycles. However, we note that there appears to be a typographical error in the new language related to this change. The new language states that GMP's current Terms and Conditions tariff is dated 2011, but the most recent version of GMP's Terms and Conditions tariff took effect on March 1, 2014. Accordingly, we require GMP to file a modified version of the Revised Service Quality Plan that includes the correct date.

6. Dockets 6120/6460, Order of 6/26/01 at 44.

Lowering the baseline for Performance Standard III.3 (Percentage of Actual Meter Readings Per Month) as proposed in the Revised Service Quality Plan benefits customers and is appropriate in light of GMP's recent implementation of "smart meters" throughout its system, which make it easier for GMP to obtain actual meter readings. Similarly, because some GMP customers have opted not to have a smart meter and therefore still have a mechanical meter, it is appropriate to clarify that this performance standard applies to all meter types.

Finally, we accept GMP's and the DPS's recommendation that the Revised Service Quality Plan take effect retroactive to April 1, 2014.

V. CONCLUSION

In this Order, we approve the Revised Service Quality Plan, as filed by GMP on July 22, 2014, and determine that it will take effect retroactively on April 1, 2014. We also require GMP to file, on or before August 8, 2014, a corrected version of the Revised Service Quality Plan that fixes an error in the reference to the date of GMP's current Terms and Conditions tariff.

VI. ORDER

IT IS HEREBY ORDERED, ADJUDGED AND DECREED by the Public Service Board of the State of Vermont that:

1. Green Mountain Power Corporation's ("GMP") revised Service Quality and Reliability Performance, Monitoring & Reporting Plan ("Revised Service Quality Plan") is approved as filed on July 22, 2014.
2. On or before August 8, 2014, GMP shall file a modified version of the Revised Service Quality Plan that corrects the reference to the date of GMP's current Terms and Conditions tariff.

Dated at Montpelier, Vermont, this 23rd day of July, 2014.

[Signature]
John D. Buckle
[Signature]

PUBLIC SERVICE
BOARD
OF VERMONT

OFFICE OF THE CLERK

FILED:

July 23, 2014

ATTEST:

[Signature]
Clerk of the Board

NOTICE TO READERS: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Board (by e-mail, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made. (E-mail address: psb.clerk@state.vt.us)

Appeal of this decision to the Supreme Court of Vermont must be filed with the Clerk of the Board within thirty days. Appeal will not stay the effect of this Order, absent further order by this Board or appropriate action by the Supreme Court of Vermont. Motions for reconsideration or stay, if any, must be filed with the Clerk of the Board within ten days of the date of this decision and Order.