



Docket No. 24-05-01 Annual Review of Affordability Programs and Offerings (Energy Affordability Annual Review)

Submitted by Mike Turaj, Policy & Public Affairs Associate

I. Background:

Operation Fuel appreciates the opportunity to file written comments in response to the Public Utilities Regulatory Authority's (PURA's or the Authority's) Notice of Request For Written Comments issued on June 18th, 2024 in Docket No. 24-05-01 Annual Review of Affordability Programs and Offerings (Energy Affordability Annual Review).

II. Comments:

1. *Provide comments on UI's proposal to transition credit and collections calls from third-party vendor customer service representatives (CSRs) to internal CSRs, filed as Motion No. 5 in this proceeding, including but not limited to, discussion of the following items: a. The estimated implementation cost to transition 35% of credit and collections calls from a third-party call center to UI's internal company CSRs; b. The proposal to transition credit and collections calls to a new third-party vendor, Alorica; and c. The assumptions included in UI's assessment and ultimate proposal pursuant to Order No. 31 of the UI Rate Case Decision. If such assumptions are found incomplete or unsatisfactory, provide alternatives for consideration.*

A. As it is not our primary area of expertise, Operation Fuel declines to engage too deeply on the details of rate making. We appreciate the work that OCC and EOE do to dig into these implementation costs. We do recommend that the Company consider shortening the length of time new employees are required to work in the office full-time. We believe that this would increase staff retention and reduce facilities costs that ratepayers would be required to support.

We appreciate UI's recognition that customer calls are becoming more frequent and complex over the past few years, as electric rates have continued to rise faster than the pace of available relief. In particular, the Company indicates their CSRs need more training in financial hardship, solar, billing, and medical protection questions. Reviewing UI's plan, we are not certain that it is necessary for all of their CSRs to be experts in each of these topic areas. As we suggested in our testimony to the CT General Assembly this March, regarding a bill¹ that would make it harder for CT residents with "life-threatening situations" to access shutoff protection, we recommend the Companies adopt a more specialized approach to work with ratepayers facing specific

¹https://www.cga.ct.gov/asp/cgabillstatus/cgabillstatus.asp?selBillType=Bill&bill_num=HB05441&which_year=2024



challenges.² A specialized unit of CSRs trained in each of the complex subject matters could increase customer satisfaction, reduce call lengths for both customer and CSRs, and decrease the workload/stress for the CSRs to learn and be able to explain complex information to individuals outside the industry.

B. Transitioning Move In-Move Out (MIMO) and other calls from iQor to Alorica seems reasonable. However, more important than the specific company is the training and incentive structure for the outsourced call center to provide to UI customers.

A call center that has no incentive to improve or provide customer satisfaction is not sustainable. UI asserts that Alorica “has the capability to deliver call handling quality that is on par with internal resources.”³ The Company reiterates this in their response to OCC interrogatories OCC-001, as the Company is “pleased with the results”⁴ of their assessment of Alorica’s overall quality and performance. However, in the Company’s response to OCC interrogatories OCC-010, the Company stated that the Alorica staff will be paid a flat hourly rate of \$18.00 per hour during training, during two weeks of on job training and for ninety days post on job training, following that, “Alorica will be paid by the call instead of by the hour.”⁵ Operation Fuel hopes that the performance of Alorica, who eventually will be paid by calls handled, won’t have the issues that iQor had. Operation Fuel is concerned that if Alorica were to handle credit and collection calls, where the Company has stated “the reality is that each call handled by the contact centers is complex.” Operation Fuel believes it is best for Alorica to handle easier matters, such as MIMO calls. The more complex calls should remain within internal call centers revamped into specific units with expertise.

From a customer service perspective, it is essential that callers reach a human being as quickly as possible. It is also helpful when CSRs can communicate a customer’s issues as they escalate the case up the chain, instead of requiring the customer to explain the same information to each CSR. While we sympathize with the company’s concerns that pursuing a standard of “perfection” is daunting, we also encourage the company to establish some goals measuring customer satisfaction.

² <https://www.cga.ct.gov/2024/etdata/TMY/2024HB-05441-R000314-Turaj,%20Mike,%20Policy-Public%20Affairs%20Associate-Operation%20Fuel-Opposes-TMY.PDF>

³ [https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/f35026e80db8209d85258b1c0070cf41/\\$FILE/2024-05-13%20UI%20Motion%20for%20Review%20and%20Approval%20Order%2031%20Cover%20Ltr%20%2324-05-01.pdf](https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/f35026e80db8209d85258b1c0070cf41/$FILE/2024-05-13%20UI%20Motion%20for%20Review%20and%20Approval%20Order%2031%20Cover%20Ltr%20%2324-05-01.pdf)

⁴ [https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/87d6f3a42d5574e885258b34004fd62e/\\$FILE/OCC-001%20UI.pdf](https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/87d6f3a42d5574e885258b34004fd62e/$FILE/OCC-001%20UI.pdf)

⁵ [https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/96820b799cce8f1185258b4a005f0e7d/\\$FILE/OCC-010%20UI.pdf](https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/96820b799cce8f1185258b4a005f0e7d/$FILE/OCC-010%20UI.pdf)



C. Operation Fuel supports the existing process whereby when a customer calls in, they hear prompts to select the reason for their call and being directed to the appropriate CSR for that issue. In addition to general intake training, Operation Fuel recommends that UI develop customer service approaches for different segments of customers, to address specific challenges, based on their direct experiences. The companies should consider establishing:

- A unit that works with **LMI and Hardship customers** to educate them on payment plans and resources available- includes answering inbound calls for customers. Ideally, the unit can process financial hardship documentation. Overall, having this unit may help the Company reach the established Matching Payment Program (MPP) success rate metric of 65%.
 - A unit that works with **medically fragile customers**. The Company has taken different approaches to reduce medical protections for customers. Current law allows the Company to pursue payment plans with rate payers. They are within their rights as creditors to seek payment from ill customers – not to terminate their service. Having a special unit of CSRs that focuses on the best approach to help this group of ratepayers with specific challenges is an effort worth exploring. We feel that a more customer service-based collections strategy is needed.
 - A unit that focuses on **solar and battery storage** issues would be an effective way to engage with these callers. Shared Clean Energy Facilities (SCEF) contains significant complex information, so a CSR needs a high level of understanding to effectively communicate with customers. This unit could also have jurisdiction over potential calls that handle energy efficiency and weatherization of homes. These CSRs could engage with the Residential Renewable Energy Services (RRES) and SCEF annual dockets, incorporating customer experience into the evidentiary record, and distilling complex information from the docket into digestible communications for ratepayers, in an ideal situation.
 - A unit that handles the complexity of **Service/Contractor Requests**. The Company has stated that these calls are “highly complex and require advanced knowledge of the Company’s Customer Information System, Company equipment, and electrical design and engineering.” Training for these calls begins more than 12 months after hire. A unit that is trained to handle these calls can alleviate pressure from CSRs already overloaded with information that changes frequently.
2. *Provide comments on UI’s proposed customer experience initiative under the Customer Journey Redesign Program, filed as Motion No. 6 in this proceeding, that aims to improve customers’ experience with CSRs and other non-digital engagement avenues.*



Operation Fuel has concerns and several questions, reviewing UI’s “Customer Experience & Customer Service” plan filed as Motion No. 6 in this proceeding.

UI presents an approach to researching the customer experience, particularly for those most likely to struggle with their electric bills. It is not clear that this plan is based on existing knowledge, such as analysis of past customer service phone calls or emails the company has received over the past few years. Additionally, we note that social science research is a specific, professional field of training. We suggest that the company engage with social research experts who can help elicit and analyze customer data gleaned from surveys, interviews, and focus groups. We also recognize that research doesn’t happen in a vacuum – it is essential to build on previous work. The company may consider reviewing studies led by [Yale researchers](#) in collaboration with Operation Fuel, and by the [Tenant Energy Advocacy \(TEA\)](#) group. Both reports focus on energy burden and the experience of vulnerable CT ratepayers who experience energy insecurity that affects several areas of their lives.

Slide 5 of the plan outlines research activities the company plans to conduct over a 16-week period. The Customer Journey Redesign Program is meant to address “offline, low-income and hardship customers’ interactions with CSRs.” There are significant gaps in the proposal. We request that the Company explain what analysis they have done on these customers’ challenges based on information they already have, as a starting place for any further investigation. We ask the Company to articulate who they would survey, how they would survey them, how many surveys would constitute a representative sample, or other basic information about this method. It is not clear how ratepayers would be chosen for in-depth interviews or focus groups, or again, how many would be conducted to generate meaningful data.

On Slide 5, Journey Redesign Focus Areas, The Company lists topics that both customers and CSRs will be asked during the interview process. While these topics are basic starting points, sample questions would help stakeholders better understand what the Company wants to achieve through their plan. There are many questions that can be derived from these broad topics; where will the Company focus on the most?

How likely are customers, who may already have an unfavorable opinion of the Company, willingly will have an in-depth interview with a CSR? How does the Company define an “in-depth interview?” How long will the interview last? What is the planned ratio of customer hang-ups to successful intake interviews? Will the Company be working off a script? Will there be any incentives for a customer to participate? What criteria will the Company use to appeal recruit survey, interview, or focus group participants? Will the participants be incentivized to participate? These are questions that Operation Fuel hoped to see an answer to in the Company’s plan.



Operation Fuel notes the importance of the “Agent-Focused” piece of the research. We are supportive of the Company’s proposal to include this vital component to the interview process. Operation Fuel suggests that the Company use past internal CSR performance reviews, which could provide a starting point into potential tools and resources needed to improve CSR-customer interaction over time.

In **Slide 7, Next Steps**, the company declines to define a successful in-depth interview process. What are the metrics for success? How many customers need to be interviewed to provide a reasonable sample?

How will workload be impacted by conducting these surveys? The Company, in their Motion No. 5 for Review and Approval anticipates an increase, to approximately 219,000, in credit and collections call volume due to the resume of non-payment disconnections for hardship connections. These numbers closely mirror pre-pandemic levels. Will CSRs be able to make these in-depth interview calls? How long? **Operation Fuel questions the rationale of spending \$300,000 of ratepayer funds on a modestly defined plan with no measure of success.**

3. *Provide comments on the Companies’ Plan, filed as Motion No. 7 in this proceeding, including but not limited to, discussion of the following: a. The proposed modifications to implement “New MPP;” b. Whether New MPP should incorporate two phases, and explain why or why not; c. The proposed method to encourage New MPP participants to apply for Connecticut Energy Assistance Program funds; d. The proposals to cease offering the voluntary Arrearage Forgiveness Programs, Eversource’s New Start Program, and UI’s Bill Forgiveness Program; e. Each Company’s proposed education and outreach plan, as well as accompanying communications materials; and f. Concerns regarding collections practices and the proposed modifications to address past due balances.*

C. The Companies recommend encouraging more ratepayers to apply for CEAP. We must recognize that this is not a realistic solution to address the actual challenge of affordability for these clients. First, far more CT residents financially qualify for CEAP than the program has funding to support. This year CEAP served more than 100,000 people; but Operation Fuel’s most recent affordability study indicates that 424,000 state residents can’t afford their energy costs.⁶ Secondly, of these funds, the majority are dedicated to primary heat sources, not just to electricity bills. For roughly 40% of homes in our state, and a majority of CEAP clients, these critical funds are used to buy oil to stay warm – and therefore would not be available to support utility costs. Third, we note that the companies are encouraging residents to “apply” for CEAP, but not necessarily to receive it. This requires ratepayers to engage in a thorough screening process whereby they supply income documentation to the state to access assistance. For a client to go through that, and potentially not receive an award because of the extremely limited

⁶ <https://operationfuel.org/veicmap/>



funding, is furthering them into debt. CEAP can be part of the solution for some clients, but we implore the Companies and the Authority to recognize that this is not a sustainable approach to ensuring affordability.

D. In developing comments for this docket, Operation Fuel received an email from a fuel bank partner, expressing concern that low-income customers are experiencing a wave of shutoffs and unaffordable reconnection fees.

“Here is something that we have caught wind of during this “shut-off” season for electricity. Several of our clients have had their electricity shut-off because they could not pay or maintain their budget payments and fell behind. We are discovering that in order to get service reconnected, they are being asked by Eversource, to pay an exorbitant reconnect fee (though I believe they are coded for hardship) and then placed on a “flat rate payment plan” which can be hundreds of dollars a month (I mean greater than \$400 or \$500/mo.). At this point, I do not have a lot of data to determine why customers are being asked to pay so much but clearly if they had difficulty paying their bills to begin with, they will have greater difficulty with these higher and seemingly unjustifiable payment amounts. Does anyone know more about what this is and why customers are not being re-routed to the somewhat more accommodating New Start program?”

Operation Fuel is concerned that eliminating New Start and Bill Forgiveness reduces options for ratepayers struggling to avoid service disconnection by staying current on a monthly plan.

E. Joint Attachment No. 09: *Prior Period Customer Assistance Event Summary*,⁷ broke down the event summary of both Companies, which included numerous metrics of participant status and clients helped. Operation Fuel greatly appreciates the Companies participating at some of the Center for Children’s Advocacy (CCA) in-person events. These events help low-income families prevent utility shutoffs, access affordable payment arrangements and increase access to available support and services. Overall, one outlier statistic for Avangrid’s events was on 2/16/2024 in Stratford. At this event, Avangrid stated that they assisted 129 customers. Their second-best event with number of customers assisted was on 10/5/2023, with 40 customers. Stakeholders may like to learn more about how the Company marketed this event, as it could help drive more customer participation and assistance at events like these. These methods could also help UI with their Customer Experience and Customer Service “in-depth” interview proposal in Motion No. 6.

We are concerned with the communication materials from UI, CNG, SCG regarding participant removal from the MPP immediately. Operation Fuel believes that there should be a warning letter, much like a shutoff communication letter, alerting the customer to an expiring MPP.

⁷ Joint Attachment #9, Cst Assistance Event Summary-
<https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/79868520003250ae85258b310042167b?OpenDocument>



Operation Fuel's programs team heard from a client last week who stated she was removed from her MPP but didn't receive a communication to that effect from her electric company until it was too late to catch up or apply for assistance. It is essential that customers receive fair, clear notice that they are in danger of being removed, with enough time and resources to reengage so they don't lose service or get moved into a less beneficial payment plan that they can't afford. ⁸

Below is a sample letter from UI.

Operation Fuel recommends the companies communicate to customers in danger of losing MPP benefits, with a warning of what they need to do by what date, to avoid being removed. We note that Eversource has a similar letter format that UI could implement, warning a customer of a possible termination in the MPP.

RE: Your Account Has Been Removed from the Matching Payment Program

Dear {Customer Name}

We did not receive the required Matching Payment Program (MPP) payment for your account. As a result, your account has been removed from the program.

We're Here to Help

If you are having trouble keeping up with your monthly Matching Payment Program amount, we can help.

You can still make up any missing payment(s) and re-enroll in the program, if you qualify. If you do not make a payment, your account may be eligible for further collection action. You will not receive additional Matching Payment Program notifications unless your account is reinstated in the program.

Let's work together to get your account re-enrolled in the program. Please contact us at **800.722.5584**, Monday through Friday 7:00 a.m. - 7:00 p.m.

For more information on our available assistance programs, please call us or visit uinet.com/HelpWithBill.

Sincerely,

Customer Care Team

(Versión en español en la otra cara)

⁸ UI's Removal MPP Letter, Attachment #8 AV-

<https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/79868520003250ae85258b310042167b?OpenDocument>



RE: Your Matching Payment Program Payment is Due

Dear (Customer Name),

We have not received your required Matching Payment Program payment amount of \$XXX that was due on 01/01/01 for account ending in 1234. Please make your payment now by logging in to your account at eversource.com. Remember, to get your matching payment you must make all your required payments on time each month.

If you haven't already, you can apply to get energy assistance from the Connecticut Energy Assistance Program (CEAP) to get a bigger match. Apply online at CT.gov/heatinghelp or through your local Community Action Agency (CAA). Find your local CAA at 211ct.org or call 211.

There's Help Available

Additional options are available to lower your bill. If you are receiving public assistance benefits, you can have your monthly payment reduced to as low as \$50. Visit eversource.com/billhelp for information about energy efficiency, solar through our Residential Renewable Energy Solutions and battery storage through our Energy Storage Solutions program. If you have any questions, please call us at 800-286-2828.

Sincerely,

Eversource Customer Service

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In this case, Operation Fuel prefers Eversource's communication approach.

F. Operation Fuel strongly disagrees with the Companies' proposal to implement a financial means test for medically protected ratepayers. Operation Fuel participated in the Wage Garnishment working group (Docket No. 22-03-16RE02), during the 2024 CT Legislative Session in proposed House Bill 5441, An Act Concerning Utility Shutoffs for Certain Customers, and now in this proceeding. Our recommendations in question 1 of these comments, is for UI to create units tailored to address certain customer needs.

Operation Fuel offers a recommendation in Avangrid's Communications Attachment #23, Information on Utility Medical Protection. This attachment lists 13 points about Connecticut medical protections. Operation Fuel believes that point 13, "What other programs are available to help customers pay their utility bills" should be moved to a more prominent spot on the communication material, rather than the final bullet point.

Operation Fuel also opposes the Companies proposed modifications to reduce arrearages found in Joint Attachment #2. The Companies proposal to "start the conversation with customers by asking how much they can afford to pay instead of immediate offering the lowest monthly payment plan amount available" can be an intimidating experience for financially stressed ratepayers. The Companies should offer the lowest payment amount first. By offering this proposal, the Companies are advocating for their ability to recover funds, more than to alleviate

⁹ Eversource's MPP Letter, ES Attachment #9 MPP Missed Payment-
<https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/79868520003250ae85258b310042167b?OpenDocument>



CT ratepayers' high cost of living. Instead, what the Companies could do is help those who are struggling to sign up and maintain a payment plan. We are concerned that the Companies have not presented a plan to achieve a 65% success rate for the MPP.

III. Conclusion:

Operation Fuel appreciates the opportunity to comment on these detailed and important questions that will affect hundreds of thousands of ratepayers in the coming year. We recommend a specialized approach to customer service for UI, training CSRs specifically to focus on solar, financial hardship, and medical protection issues. We believe that UI's Customer Journey Redesign Program needs more detail, and recommend the Company consider professional researchers to help them manage it. Additionally, we believe that removing the Bill Forgiveness Program and New Start will harm vulnerable ratepayers. Finally, we believe it is essential that the companies communicate effectively with clients before they are removed from a payment program, and ideally to avoid shutoff which drives up customer and company costs that can eventually lead to increased rates.

We want to thank the Authority for the consideration of our comments and for the support of ratepayers across Connecticut.

Sincerely,

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