

November 4, 2019

VIA HAND DELIVERY & ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

**RE: Docket 3476 – Quarterly Report on Service Quality Plan
First Quarter Report – FY 2020**

Dear Ms. Massaro:

Enclosed for filing are ten (10) copies of National Grid's¹ fiscal year (FY)² 2020 first quarter performance results for its gas operations under the Gas Service Quality Plan (Service Quality Plan) established in the above-referenced docket. The enclosed quarterly report covers the period from July 1, 2019 through September 30, 2019. The information included in this quarterly report compares FY 2020 first quarter performance against the updated benchmarks provided to the Public Utilities Commission (PUC) on August 6, 2019 as part of National Grid's Annual Service Quality Report.

Attachment 1, Page 2 provides a summary of the Service Quality performance for FY 2020 first quarter. As shown on Attachment 1, Page 2, Column (8), National Grid's first quarter performance was within one standard deviation of the established benchmarks in all areas except for the following:

- Call Center Responsiveness, % Abandoned Calls and % Calls Answered in 60 Seconds:
The Company's first quarter performance was greater than one standard deviation for % Abandoned Calls and two standard deviations for % Calls Answered in 60 Seconds. The Company has continued to experience longer than normal hold times (i.e. customers waiting for an agent) and call handling times as a result of the implementation of a new Agent & Interaction Management system to replace the current Interactive Voice Response system, which will eventually provide additional options for customers to self-serve. The Company is continuing the process of trouble-shooting this new system and experienced a positive trend in performance starting in September 2019, as shown on Attachment 1, Page 1, Column 3. The Company expects performance of these metrics to continue improving as the new Agent & Interaction Management system continues to mature.

¹ The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

² The fiscal year in Docket No. 3476 runs from July 1 through June 30.

- Service Appointments Met: The Company’s first quarter performance for this metric was greater than one standard deviation for July and August, and the Company is still processing the September data, which was not yet finalized as of this report. The Company’s under performance in this area and the unavailability of the September data have separate root causes, both of which relate to ongoing rollout of Gas Business Enablement (GBE). The Company has identified the GBE-related root causes of the missed appointments, with some now resolved, and has put in place control reports to monitor while the Company continues to develop and implement resolutions. The Company expects this metric to continue to improve as the new GBE system rollout continues to mature in the upcoming quarters.
- Leak-Call Response: The Company’s first quarter performance for this metric was greater than one standard deviation. This temporary decline in performance directly correlated to issues identified during the GBE rollout during July and August. The Company has, and continues to, actively work to remedy those issues and identify improvement opportunities during the GBE rollout, and this is reflected in the Company’s performance during September, in which the Company exceeded the benchmark, as shown on Attachment 1, Page 1, Column 3.

Please note that during the rollout of GBE and migration of performance reports to the new system, the Company discovered that its historical calculation method for Leak-Call Response reports during Normal Business Hours was based on Monday-Friday 8:00 a.m. to 4:30 p.m. (excluding holidays). As part of the GBE implementation, the Company has standardized normal business hours to be 8 a.m. to 4 p.m., which correlates to a normal working shift for Company personnel. When the Company analyzed this in the context of the Service Quality Plan approved in PUC Order No. 17605 (November 21, 2003) in Docket No. 3476, it determined that these hours are consistent with the approved Service Quality Plan.³ Nonetheless, the Company recognizes that over the history of this metric, it has reported actual performance results based on Normal Business Hours of 8 a.m. to 4:30 p.m. For this reason, the Company is reporting its actual performance results using both calculation methods for Normal Business Hours, as shown on Attachment 1, pages 1 and 2.

Based on National Grid’s actual performance results using the historical calculation method where Normal Business Hours end at 4:30 p.m., National Grid would have incurred a penalty equal to \$91,008 for the first quarter FY 2020 for Leak-Call Response during Normal Business Hours since the weighted average performance for the quarter fell slightly below the penalty threshold by 0.43 percent. The Company requests relief from this penalty under the Service Quality Plan as a result of an exogenous event. Pursuant to PUC Order No. 17605, if the Company “contends that an exogenous event or a force majeure occurred, it must seek relief from the Commission and the burden of proof will be on [the Company].” The Company’s July and August performance for Leak-Call Response during Normal Business Hours fell slightly below the penalty threshold for this metric as a result of an exogenous event, namely the GBE rollout because, but for the issues identified during the rollout, the Company would have met the metric when calculated using either definition of Normal Business

³ Normal Business Hours is not explicitly defined in the Service Quality Plan; however, the Company’s predecessor, New England Gas, defined Normal Business Hours as Monday through Friday 8:00 a.m. to 4:00 p.m. in its pre-filed written testimony in Docket No. 3476. See Direct Testimony of witnesses Karen Czaplewski and Charles Meunier in support of Service Quality Plan (09/30/02), Docket No. 3476 at 10.

Hours. This is evident in that the Company has consistently met this metric in the months prior to the GBE rollout, and, again during the post-GBE rollout as reflected in the Company's performance results for September. The issues related to GBE were not foreseeable to the Company at the time of the GBE rollout. As noted above, the Company continues to remedy those issues and identify improvement opportunities.

Alternatively, if the PUC does not find that the GBE rollout constitutes an exogenous event under the Service Quality Plan, the Company submits that it is entitled to relief from the penalty on the basis that it has historically reported performance on a more stringent metric than required under the approved Service Quality Plan, and that if those missed calls occurring between 4:00 p.m. and 4:30 p.m. are moved into the After Business Hours category, the Company's first quarter performance would have been within one standard deviation of the established benchmark. For these reasons, the Company respectfully requests relief from the PUC from the Leak-Call Response penalty.

The Company also proposes to modify its calculation method for Leak-Call Response during Normal Business Hours to reflect Monday through Friday 8:00 a.m. to 4:00 p.m. in future quarterly reports to align its reporting requirement with the Company's standard business hours. The Company will engage with the Division of Public Utilities and Carriers to determine whether this adjustment will require any modifications to the benchmarks under the approved Service Quality Plan, and will update the PUC accordingly.

Thank you for your attention to this filing. If you have any questions, please contact me at 401-784-7288.

Very truly yours,



Jennifer Brooks Hutchinson

Enclosures

cc: Docket 3476 Service List
Leo Wold, Esq.
Al Mancini, Division

NATIONAL GRID - GAS OPERATIONS
SERVICE QUALITY PERFORMANCE
FISCAL YEAR 2020 - FIRST QUARTER REPORT (3rd Quarter CY2019) ¹

<u>SERVICE QUALITY MEASURES</u>	<u>Jul-19</u>	<u>Aug-19</u>	<u>Sep-19</u>	<u>Total or Weighted Average</u>	<u>Benchmark</u>	<u>Penalty Threshold</u>
<u>CALL CENTER RESPONSIVENESS</u>						
Total Calls Answered	27,492	34,188	31,551	93,231		
Abandoned Calls	<u>3,923</u>	<u>4,445</u>	<u>2,582</u>	10,950		
Total Calls Offered	31,415	38,633	34,133	104,181		
% Abandoned Calls	12.49%	11.51%	7.56%	10.51%	2.94%	5.71%
Answered in 60 Seconds	22,086	25,673	25,005	72,764		
% Calls Answered in 60 Seconds	70.30%	66.45%	73.26%	69.84%	86.09%	77.94%
<u>METER READS</u>						
Scheduled Meters	281,158	281,257	281,751	844,166		
Meters Read	278,211	278,022	278,206	834,439		
% On-Cycle Meter Reads	98.95%	98.85%	98.74%	98.85%	98.30%	95.70%
<u>METER TESTING ²</u>						
					<u>CY2019 YTD</u>	<u>CY2019 GOAL</u>
<= 500 Cfh ³ (180 month test interval)	1,007	783	1,398	3,188	10,091	33,182
> 500 Cfh (120 month test interval)	176	158	148	482	1,458	3,364
Meters Not Tested (Attempts Exhausted)	2,337	2,442	1,697	6,476	22,132	
Inactive Meters	-29	-97	-108	-234	1,895	
Total					35,576	36,546
<u>CUSTOMER REQUESTED TESTS</u>						
Customer Requested Tests	0	0	0	0		
Tests Completed in 15 Days	0	0	0	0		
% Completed in 15 Days	100.0%	100.0%	100.0%	100.0%	99.60%	94.04%
<u>SERVICE APPOINTMENTS</u>						
Scheduled Service Appointments ⁴	1,571	742		2,313		
Completed Service Appointments ⁴	1,507	648		2,155		
% Service Appointments Met	95.93%	87.33%		93.17%	94.94%	93.84%
<u>SAFETY</u>						
Leak-Call Response:						
Normal Business Hours: M-F 8:00-16:30 (excluding holidays)						
- Total Calls	333	329	391	1,053		
- Response in 30 Minutes or Less	307	303	375	985		
% in 30 Minutes or Less	92.19%	92.10%	95.91%	93.54%	95.38%	93.97%
After Business Hours ⁵:						
- Total Calls	270	270	316	856		
- Response in 45 Minutes or Less	261	254	302	817		
% in 45 Minutes or Less	96.67%	94.07%	95.57%	95.44%	95.27%	94.38%
Normal Business Hours ⁶: M-F 8:00-16:00 (excluding holidays)						
- Total Calls	320	309	380	1,009		
- Response in 30 Minutes or Less	295	288	367	950		
% in 30 Minutes or Less	92.19%	93.20%	96.58%	94.15%	95.38%	93.97%
After Business Hours ^{5,6}:						
- Total Calls	282	289	327	898		
- Response in 45 Minutes or Less	272	272	311	855		
% in 45 Minutes or Less	96.45%	94.12%	95.11%	95.21%	95.27%	94.38%

¹Note: Docket 3476 fiscal year runs July 1 through June 30.

reflects all meters that are aged greater than the 120 and 180 month test intervals and any meter aging during calendar year 2019. The final calendar year results will be adjusted to reflect the total of attempted periodic

³ The definition of commercial and residential meters changed in October 2012 to reflect the revised Division 2006 Regulations. Under those regulations, meters with a capacity greater than 500 cubic feet per hour

⁴ Only data for July and August 2019 is currently available. Data for September 2019 is still being processed as part of the Gas Business Enablement (GBE) rollout.

⁵ The After Business Hours benchmarks were modified effective January 1, 2013 and are now fixed at a mean 95.27% with a penalty threshold of 94.38%

⁶ Business Hours are defined as M-F 8:00-16:00 (excludes weekends and holidays). After Business hours are all other days/hours outside of M-F 8:00-16:00 (including holidays). As of 7/1/2019, a correction has been made to the data parameters for Leak-Call Response which changes the end of Business Hours from 16:30 to 16:00. The correction was made during the rollout of updated reports for GBE.

NATIONAL GRID - GAS OPERATIONS
SERVICE QUALITY PERFORMANCE
FISCAL YEAR 2020 - FIRST QUARTER REPORT (3rd Quarter CY2019)*

<u>SERVICE QUARTERLY MEASURES</u>	Benchmark (Mean) (1)	Standard Deviation (2)	Penalty Threshold (3)	Penalty Weight (4)	Maximum Penalty (5)	1st Quarter Performance (6)	Variance from Mean (7)	# Standard Deviations (8)	Penalty (9)
Customer Service and Billing:									
Abandoned Calls	2.94%	2.77%	5.71%	12%	\$150,000	10.51%	-7.57%	2.7331	\$0
Calls Answered in 60 Seconds	86.09%	8.15%	77.94%	12%	\$150,000	69.84%	-16.25%	1.9934	\$0
On-Cycle Meter Reads	98.30%	2.60%	95.70%	6%	\$75,000	98.85%	0.55%	0.2107	\$0
Meter Testing ¹⁰	CY2019 YTD	CY2019 Goal		6%	\$75,000				\$0
Total Meters <=500 Cfh Tested (180 month test interval)	10,091	33,182				3,188			
Total Meters >500 Cfh Tested (120 month test interval)	1,458	3,364				482			
Meters Not Tested (Attempts Exhausted)	22,132								
Inactive Meters	1,895								
Total	35,576	36,546							
Customer Requested Meter Tests	99.60%	5.56%	94.04%	4%	\$50,000	100.00%	0.40%	0.0719	\$0
Service Appointments Met	94.94%	1.10%	93.84%	12%	\$150,000	93.17%	-1.77%	1.6100	\$0
Safety - Leak Call Response:									
Normal Business Hours: M-F 8:00-16:30 (excluding holidays)									
Normal Business Hours-30 min or less	95.38%	1.41%	93.97%	24%	\$300,000	93.54%	-1.84%	1.3034	\$91,008.47 **
After Business Hours-45 min or less	95.27%	0.89%	94.38%	24%	\$300,000	95.44%	0.17%	0.1954	\$0
Normal Business Hours**: M-F 8:00-16:00 (excluding holidays)									
Normal Business Hours-30 min or less	95.38%	1.41%	93.97%	24%	\$300,000	94.15%	-1.23%	0.8705	\$0
After Business Hours-45 min or less	95.27%	0.89%	94.38%	24%	\$300,000	95.21%	-0.06%	0.0656	\$0
				100%	\$1,250,000				\$91,008

Notes:

(1)-(5) Submitted in Annual Service Quality Report filed on 8/6/2019.

(6) First quarter of fiscal year 2020 performance data.

(7) Calculated as (6) plus or minus (1), where positive results reflect above-average performance.

(8) Calculated as (7) divided by (2).

(9) Penalties are assessed when performance exceeds one standard deviation from the mean, with the maximum penalty assessed at two standard deviations from the mean. Only the penalties related to the safety measures are assessed quarterly.

(10) The meter testing measure is compiled on a calendar year basis. Therefore, this fiscal year 2020 first quarter report reflects activity between January 2019 through December 2019. The calendar year 2019 goal reflects all meters that are aged greater than the 120 and 180 month test intervals and any meter aging during calendar year 2019. The final calendar year results will be adjusted to reflect the total of attempted periodic tests of meters and will be provided at calendar year end.

* Note: Docket 3476 fiscal year runs July 1 through June 30.

** Note: The penalty dollars are calculated as follows: (1.3034-1.0) X \$300,000 = \$91,008.47

*** Note: Business Hours are defined as M-F 8:00-16:00 (excludes weekends and holidays). After Business hours are all other days/hours outside of M-F 8:00-16:00 (including holidays). As of 7/1/2019, a correction has been made to the data parameters for Leak-Call Response which changes the end of Business Hours from 16:30 to 16:00. The correction was made during the rollout of updated reports for GBE.

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.

Joanne M. Scanlon

November 4, 2019
Date

**Docket No. 3476 – National Grid Gas - Service Quality Plan
Service list updated on 7/26/2019**

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