

March 4, 2016

VIA HAND DELIVERY & ELECTRONIC MAIL

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

**RE: Docket 3628 – National Grid’s Electric Service Quality Plan
Settlement Agreement
Responses to PUC Data Requests – Set 1**

Dear Ms. Massaro:

Enclosed are ten (10) copies of National Grid’s¹ responses to the data requests issued by the Public Utilities Commission in the above-referenced docket.

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

Very truly yours,



Jennifer Brooks Hutchinson

Enclosures

cc: Docket 3628 Service List
Leo Wold, Esq.
Steve Scialabba, Division
James Lanni, Division

¹ The Narragansett Electric Company d/b/a National Grid.

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

March 4, 2016
Date

**National Grid – Electric Service Quality Plan – Compliance - Docket 3628
Service List Updated 1/11/16**

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The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 3628
In Re: Proposed Service Quality Plan Settlement Agreement
Responses to Commission's First Set of Data Requests
Issued February 23, 2015

COMM 1-1

Request:

Provide a red-lined version of the Service Quality Plan proposed in the January 8, 2016 filing (Attachment 1) showing all additions, deletions and other edits to the currently existing Service Quality Plan.

Response:

Please see Attachment COMM 1-1 for a red-lined version of the Amended Service Quality Plan, highlighting the proposed changes marked against the 2007 Service Quality Plan.

**NATIONAL GRID
AMENDED ELECTRIC SERVICE QUALITY PLAN**

The Narragansett Electric Company d/b/a National Grid (“Company”) shall establish the performance standards for reliability and customer service that are set forth in this document. The standards are designed as a penalty-only approach, under which the Company would be penalized if its performance did not meet the standards. The Company receives no reward for performance which exceeds the standards. However, positive performance in one category can be used to offset penalties in other categories within a given year. The Company shall file annually by May 1 a report of its performance during the prior calendar year under the performance standards in this plan. Any net penalty balance reflected in the Company’s annual report shall be credited to customers in a manner determined by the Rhode Island Public Utilities Commission (the “Commission”/PUC) at that time.

The maximum penalty authorized under the standards set forth below is \$2.2 million per year. The performance standards set forth below shall be in effect for the calendar year 2007 and continue through 2009 or until they are modified by the Commission.

NOTE: When interpreting the performance standards that follow, please note that pages 6 through 8 of this Exhibit contain definitions of terms used in the standards.

FREQUENCY OF INTERRUPTIONS PER CUSTOMER SERVED

<u>Year</u>	<u>SAIFI*</u>
2004	0.91
2003	1.08
2002	0.97
2001	1.09
2000	0.97
1999	0.94
1998	0.89
1997	0.75
1996	0.90

		Log Average	-0.063		
		Log Std. Dev.	0.112		
	-2 Std Dev.	-1 Std Dev.	Mean	+1 Std Dev.	+2 Std Dev.
Log Normal	-0.288	-0.175	-0.063	0.050	0.162
SAIFI	0.75	0.84	0.94	1.05	1.18

**NATIONAL GRID
AMENDED ELECTRIC SERVICE QUALITY PLAN**

PERFORMANCE STANDARD – SAIFI (System Average Interruption Frequency Index):	
SAIFI Company <u>Target</u>	(Penalty)/ <u>Offset</u>
More than 1.18	(\$916,000)
1.06 – 1.18	linear interpolation
0.84 – 1.05	\$0
0.75 – 0.83	linear interpolation
Less than 0.75	\$229,000

* The calculations are based on the IEEE Std. 1366-2003 2.5B methodology for the Company. Major Event Day results are removed from these calculations, but reported. The target bands are calculated considering the lognormal nature of the data. To do this, the lognormal mean and lognormal standard deviation are calculated and applied in lognormal space, which is done by applying the mean, 1 standard deviation, and 2 standard deviations and then converting back to normal space.

$$\text{SAIFI} = \frac{\text{Total Number of Customers Interrupted}}{\text{Total Number of Customers Served}}$$

DURATION OF INTERRUPTIONS PER CUSTOMER SERVED

<u>Year</u>	<u>SAIDI*</u>
2004	66.1
2003	74.9
2002	71.0
2001	69.0
2000	60.2
1999	52.3
1998	42.2
1997	40.9
1996	51.9

	Log Average	4.051			
	Log Std. Dev.	0.224			
	-2 Std Dev.	-1 Std Dev.	Mean	+1 Std Dev.	+2 Std Dev.
Log Normal	3.604	3.827	4.051	4.275	4.498
SAIDI	36.7	45.9	57.5	71.9	89.9

**NATIONAL GRID
AMENDED ELECTRIC SERVICE QUALITY PLAN**

PERFORMANCE STANDARD – SAIDI (System Average Interruption Duration Index):

SAIDI Company Target	(Penalty)/ Offset
More than 89.9	(\$916,000)
72.0 – 89.9	linear interpolation
45.9 – 71.9	\$0
36.7 – 45.8	linear interpolation
Less than 36.7	\$229,000

* The calculations are based on the IEEE Std. 1366-2003 2.5B methodology for the Company. Major Event Day results are removed from these calculations, but reported. The target bands are calculated considering the lognormal nature of the data. To do this, the lognormal mean and lognormal standard deviation are calculated and applied in lognormal space, which is done by applying the mean, 1 standard deviation, and 2 standard deviations and then converting back to normal space.

$$\text{SAIDI (minutes)} = \frac{\text{Total Customer Minutes Interrupted}}{\text{Total Number of Customers Served}}$$

**NATIONAL GRID
AMENDED ELECTRIC SERVICE QUALITY PLAN**

CUSTOMER CONTACT SURVEY

<u>MonthYear</u>	<u>% Satisfied*</u>
<u>2004</u>	<u>77.8%</u>
<u>2003</u>	<u>79.3%</u>
<u>2002</u>	<u>76.0%</u>
<u>2001</u>	<u>77.3%</u>
<u>2000</u>	<u>83.2%</u>
<u>1999</u>	<u>82.1%</u>
<u>1998</u>	<u>77.8%</u>
<u>1997</u>	<u>79.5%</u>
<hr/>	
<u>August 2013</u>	<u>87.7%</u>
<u>September 2013</u>	<u>86.8%</u>
<u>October 2013</u>	<u>86.0%</u>
<u>November 2013</u>	<u>83.3%</u>
<u>December 2013</u>	<u>87.5%</u>
<u>January 2014</u>	<u>85.8%</u>
<u>February 2014</u>	<u>82.4%</u>
<u>March 2014</u>	<u>81.7%</u>
<u>April 2014</u>	<u>84.1%</u>
<u>May 2014</u>	<u>78.7%</u>
<u>June 2014</u>	<u>80.3%</u>
<u>July 2014</u>	<u>90.5%</u>
<u>August 2014</u>	<u>81.7%</u>
<u>September 2014</u>	<u>84.7%</u>
<u>October 2014</u>	<u>89.8%</u>
<u>November 2014</u>	<u>82.3%</u>
<u>December 2014</u>	<u>85.5%</u>
<u>January 2015</u>	<u>83.6%</u>
<u>February 2015</u>	<u>76.1%</u>
<u>March 2015</u>	<u>78.7%</u>
<u>April 2015</u>	<u>75.5%</u>
<u>May 2015</u>	<u>79.1%</u>
<u>June 2015</u>	<u>83.0%</u>
<u>July 2015</u>	<u>82.2%</u>

Aug 2013 – July 2014
Aug 2014 – July 2015

Mean 83.2%79.1%
Standard Deviation 4.42.3%

**NATIONAL GRID
AMENDED ELECTRIC SERVICE QUALITY PLAN**

PERFORMANCE STANDARD – Customer Contact:

<u>% Satisfied</u> <u>Target</u>	<u>(Penalty)/</u> <u>Offset</u>
Less than <u>74.45%</u>	(\$184,000)
<u>74.45%</u> – <u>786.7%</u>	linear interpolation
<u>768.8%</u> – <u>87.614%</u>	\$0
<u>871.75%</u> – <u>92.083.7%</u>	linear interpolation
More than <u>92.083.7%</u>	\$46,000

* The calculations are based on responses from customers of the Company based on surveys performed by an independent third party consultant. A vendor surveys a random sample of the Company's customers who have contacted the call center recently are surveyed in order to determine their level of satisfaction with their most recent contact with the Company regarding any call reason. Overall survey results are based on a composite measure of responses from customers to the following 2 questions taken from National Grid's contactor survey: (1) Overall, on a scale from 1 to 10, where 1 means "dissatisfied" and 10 means "satisfied", how satisfied are you with the services provided by National Grid? (2) Overall, on a scale from 1 to 10, where 1 means "dissatisfied" and 10 means "satisfied", how satisfied are you with the quality of the service provided by the telephone representative?

The individual satisfaction scores for each question are is the percentage of respondents who provide a rating of "8", "9", or "10" on a 10-point scale where 1 means "dissatisfied" and 10 means "satisfied". The "percent satisfied" composite score is a simple arithmetic average of the satisfaction score from each question.

Eight types of transactions are included in the survey, and the overall results are weighted based on the number of these transactions actually performed at the call center during the year.

The percent satisfied represents the responses in the top two categories of customer contact satisfaction under a seven-point scale, where 1=extremely dissatisfied and 7=extremely satisfied.

**NATIONAL GRID
AMENDED ELECTRIC SERVICE QUALITY PLAN**

TELEPHONE CALLS ANSWERED WITHIN 20 SECONDS

<u>Year</u>	<u>Percent of Calls Answered Within 20 Secs*</u>
2004	94.1%
2003	93.3%
2002	84.0%
2001	50.4%
2000	76.7%
1999	76.9%
1998	80.9%
1997	76.7%
1996	70.2%
Mean	78.1%
Standard Deviation	12.3%

PERFORMANCE STANDARD – Telephone Calls Answered within 20 Seconds:

<u>% Calls Answ Within 20 Seconds Target</u>	<u>(Penalty)/ Offset</u>
Less than 53.5%	(\$184,000)
53.5% – 65.7%	linear interpolation
65.8% – 90.4%	\$0
90.5% – 100.0%	linear interpolation

* The percent of calls answered within 20 seconds is calculated by dividing the number of calls answered within 20 seconds by the total number of calls answered during the year. "Calls answered" include calls answered by a customer service representative ("CSR") and calls completed within the Voice Response Unit ("VRU"). The time to answer is measured once the customer makes a selection to either speak with a CSR or use the VRU. VRU calls are included beginning in the year 2000.

$$\text{Percent of Calls Answered Within 20 Seconds} = \frac{\text{Total Calls Answered Within 20 Seconds}}{\text{Total Calls Answered}}$$

**NATIONAL GRID
AMENDED ELECTRIC SERVICE QUALITY PLAN**

**DEFINITIONS OF
PERFORMANCE STANDARD
MEASUREMENTS**

The following reliability definitions used in conjunction with the performance standards are in accordance with the Institute of Electrical and Electronics Engineers, Inc. (“IEEE”) Std. 1366-2003. It is assumed that additional reliability-related definitions found in this standard are also implicit in the reliability calculations.

CUSTOMER COUNT

The number of customers either served or interrupted depending on usage.

TOTAL NUMBER OF CUSTOMERS SERVED

The average number of customers served during the reporting period. If a different customer total is used, it must be clearly defined within the report.

TOTAL NUMBER OF CUSTOMERS INTERRUPTED

The sum of the customers losing electric service for any defined grouping of interruption events during the reporting period.

TOTAL CUSTOMER MINUTES INTERRUPTED

The product of the number of customers interrupted and the interruption duration for any interruption event. Also, the sum of those products for any defined grouping of interruption events.

MAJOR EVENT

Designates an event that exceeds reasonable design and or operational limits of the electric power system. A Major Event includes at least one Major Event Day.

MAJOR EVENT DAY

A day in which the daily system SAIDI exceeds a threshold value, T_{MED} . For the purposes of calculating daily system SAIDI, any interruption that spans multiple calendar days is accrued to the day on which the interruption began. Statistically, days having a daily system SAIDI greater than T_{MED} are days on which the energy delivery system experienced stresses beyond that normally expected (such as severe weather). Activities that occur on major event days should be separately analyzed and reported. The T_{MED} threshold value will be fixed at 5.34 for the years 2007 and 2008, at which time the Company’s performance will be reviewed to determine if the threshold value should be re-calculated using the IEEE Std. 1366-2003 methodology.

**NATIONAL GRID
AMENDED ELECTRIC SERVICE QUALITY PLAN**

SAIFI (System Average Interruption Frequency Index)

The system average interruption frequency index indicates how often the average customer experiences a sustained interruption over a predefined period of time. Mathematically, this equation is given in (1).

$$SAIFI = \frac{\sum \text{Total Number of Customers Interrupted}}{\text{Total Number of Customers Served}} \quad (1)$$

To calculate the index, use equation (2) below.

$$SAIFI = \frac{\sum N_i}{N_T} = \frac{CI}{N_T} \quad (2)$$

Where:

- i denotes an interruption event
- CI = Customers Interrupted
- N_T = Total Number of Customers Served for the Area

SAIDI (System Average Interruption Duration Index)

This index indicates the total duration of interruption for the average customer during a predefined period of time. It is commonly measured in customer minutes or customer hours of interruption. Mathematically, this equation is given in (3).

$$SAIDI = \frac{\sum \text{Customer Interruption Durations}}{\text{Total Number of Customers Served}} \quad (3)$$

To calculate the index, use equation (4).

$$SAIDI = \frac{\sum r_i N_i}{N_T} = \frac{CMI}{N_T} \quad (4)$$

Where:

- i denotes an interruption event
- r_i = Restoration Time for each Interruption Event
- CMI = Customer Minutes Interrupted
- N_T = Total Number of Customers Served for the Area

NATIONAL GRID AMENDED ELECTRIC SERVICE QUALITY PLAN

CUSTOMER CONTACT SURVEY

A vendor surveys a random sample of the Company's customers who have contacted the call center recently in order to determine their level of satisfaction with their most recent contact with the Company regarding any call reason. Overall survey results are based on a composite measure of responses from customers to the following 2 questions taken from National Grid's contactor survey: (1) Overall, on a scale from 1 to 10, where 1 means "dissatisfied" and 10 means "satisfied", how satisfied are you with the services provided by National Grid? (2) Overall, on a scale from 1 to 10, where 1 means "dissatisfied" and 10 means "satisfied", how satisfied are you with the quality of the service provided by the telephone representative?

The individual satisfaction scores for each question are the percentage of respondents who provide a rating of "8", "9", or "10" on a 10-point scale where 1 means "dissatisfied" and 10 means "satisfied". The composite score is a simple arithmetic average of the satisfaction score from each question.

The calculations are based on responses from customers, based on surveys performed by an independent third party consultant. A sample of customers who have contacted the call center are surveyed in order to determine their level of satisfaction with their contact. The Company will maintain the same levels of statistical precision of the results as in prior surveys. Eight types of transactions are included in the survey, and the overall results are weighted based on the number of these transactions actually performed at the call center during the year. The eight types of transactions are power interruptions, meter on, meter off, meter exchange, collection, payment plan, meter reread, and meter test.

The percent satisfied represents the responses in the top two categories of customer contact satisfaction under a seven point scale, where 1=extremely dissatisfied and 7=extremely satisfied.

TELEPHONE CALLS ANSWERED WITHIN 20 SECONDS

The percent of calls answered within 20 seconds is calculated by dividing the number of calls answered within 20 seconds by the total number of calls answered during the year. "Calls answered" include calls answered by a customer service representative ("CSR") and calls completed within the voice response unit ("VRU"). Abandoned calls are not considered. The time to answer is measured once the customer makes a selection to either speak with a CSR or use the VRU. VRU calls are included beginning in the year 2000.

**NATIONAL GRID
AMENDED ELECTRIC SERVICE QUALITY PLAN**

LINEAR INTERPOLATION

- (1) The actual performance or penalty each year will be calculated and the result will be scaled or interpolated linearly between the relevant two points of the results range and the relevant two points on the dollar range.
- (2) The method of determining the actual penalty, or offset, of each performance standard is determined by multiplying the value of the penalty, or offset, by the absolute value of the actual performance indicator minus the value of the first standard deviation from the mean of that indicator, divided by the value of the second standard deviation of the mean of that indicator minus the value of the first standard deviation from the mean of that indicator.

$$\text{\$ Penalty or Offset} = \text{Penalty or Offset \$ Value} \times \frac{\text{Actual} - 1^{\text{st}} \text{ standard deviation}}{2^{\text{nd}} \text{ standard deviation} - 1^{\text{st}} \text{ standard deviation}}$$

ADDITIONAL REPORTING CRITERIA

1. Each quarter, the Company will file a report of 5% of all circuits designated as worst performing on the basis of customer frequency.

Included in the report will be:
 1. The circuit id and location.
 2. The number of customers served.
 3. The towns served.
 4. The number of events.
 5. The average duration.
 6. The total customer minutes.
 7. A discussion of the cause or causes of events.
 8. A discussion of the action plan for improvements including timing.
2. The Company will track and report monthly the number of calls it receives in the category of Trouble, Non-Outage. This includes inquiries about dim lights, low voltage, half-power, flickering lights, reduced TV picture size, high voltage, frequently burned out bulbs, motor running problems, damaged appliances and equipment, computer operation problems and other non-Interruptions related inquiries.
3. The Company will report its annual meter reading performance as an average of monthly percentage of meters read.

**NATIONAL GRID
AMENDED ELECTRIC SERVICE QUALITY PLAN**

4. For each event defined as a Major Event Day, the Company will prepare a report, which will be filed annually as part of the annual SQ filing, detailing the following information:
 1. Start date/Time of event.
 2. Number/Location of crews on duty (both internal and external crews).
 3. Number of crews assigned to restoration efforts.
 4. The first instance of mutual aid coordination.
 5. First contact with material suppliers.
 6. Inventory levels: pre-event/daily/post-event.
 7. Date/Time of request for external crews.
 8. Date/Time of external crew assignment.
 9. # of customers out of service by hour.
 10. Impacted area.
 11. Cause.
 12. Weather impact on restoration.
 13. Analysis of protective device operation.
 14. Summary of customers impacted.

COMM 1-2

Request:

This question relates to Page 5 of the 2015 Amended Electric Service Quality Plan filed January 8, 2016 which states the following,

“A vendor surveys a random sample of the Company’s customers who have contacted the call center recently in order to determine their level of satisfaction with their most recent contact with the Company regarding any call reason.”

- a) Does the above language adequately convey the point expressed in the cover letter of Jennifer Brooks Hutchinson (Page 2 of 3) and the Settlement Agreement (Page 2) that the updated service quality plan will target a larger segment of the customer population, i.e. “almost double” the number of the regulated survey (Settlement Agreement at 2).
- b) Assuming the answer to (a) is no, identify the appropriate section(s) of the proposed Service Quality Plan which overtly state that the new survey will be exposed to a larger and more representative sample of the customer population.
- c) If there are no sections in the proposed SQ Plan reflecting that the new survey will cover a broader segment of the customer base, is the Company willing to incorporate appropriate language to clearly and unambiguously convey this point in both the body of the Plan and in the definition of “Customer Contact Survey” on page 9 of the Agreement?

Response:

- a) The cited language above is similar to the language in the 2007 Service Quality Plan, and is still applicable to the proposed survey. The Company will continue to use a third-party vendor and utilize random sampling. The point in Ms. Hutchinson’s filing letter that the proposed survey in the Amended Service Quality Plan will target a larger segment of the customer population was to highlight one of the benefits of using a different, more representative survey. There are two key reasons why the sample for the proposed survey will be broader:

COMM 1-2, page 2

- 1) The existing regulated survey is limited to customers who contact the Company for one of eight pre-defined "call reasons." They are: (1) power outage, (2) meter on, (3) meter off, (4) meter exchange, (5) collections, (6) payment plan, (7) meter read, and (8) meter test. The proposed survey does not limit calls to these pre-defined reasons and, thus, will target a more representative customer population.
 - 2) More customers will have the opportunity to participate in the survey. The existing regulated survey collects 800 customer survey responses per year while the proposed study will collect approximately 1,560 survey responses.
- b) See subpart (a) of this response.
- c) The Company does not object to further modifying the Amended Service Quality Plan to more clearly state that the survey will cover a broader segment of the customer base. For further clarity the Company proposes to add a sentence following the language above in the body of the Amended Service Quality Plan and in the definition of "Customer Contact Survey" to state: "The survey is not limited to any one transaction type, and the survey results will be based on approximately 1,500 survey responses annually, thereby reaching a broad segment of the customer population."

COMM 1-3

Request:

What historical benchmark did the Company use to evaluate customer survey results prior to the proposed 24-month period of August 2013 through July 2015?

Response:

Prior to the proposed 24-month period of August 2013 through July 2015, the Company used the historical benchmark set in the 2007 Service Quality Plan for the current regulated survey. This benchmark reflects the average of the annual scores (percent of customers surveyed who rated their experience a 6 or 7 on a 1 to 7 point scale) from 1997 to 2004.

NATIONAL GRID AMENDED ELECTRIC SERVICE QUALITY PLAN		Attachment 1 Page 4 of 9
CUSTOMER CONTACT SURVEY		
<u>Year</u>	<u>% Satisfied*</u>	
2004	77.8%	
2003	79.3%	
2002	76.0%	
2001	77.3%	
2000	83.2%	
1999	82.1%	
1998	77.8%	
1997	79.5%	
Mean	79.1%	
Standard Deviation	2.3%	

COMM 1-4

Request:

This question refers to Page 1 of the 2015 Amended Electric Service Quality Plan filed January 8, 2016 which states the following,

“The performance standards set forth below shall be in effect for the calendar year 2007 and continue through 2009 or until they are modified by the Commission.”

- a) Did the Company intentionally include references to prior years (2007 through 2009) for the effective dates of the proposed performance standards?
- b) Given the proposed effective date of January 1, 2016, does the Company wish to amend the SQ Plan to include prospective effective dates?

Response:

- (a) No. The language on Page 1 of the 2015 Amended Electric Service Quality Plan filed on January 8, 2016 is a carryover from the 2007 version of the Electric Service Quality Plan. That language should have been amended as part of this filing to read: “The performance standards set forth below shall be in effect for the calendar year 2016 and shall continue until they are further modified by the Commission.”
- (b) Yes, the Company seeks to amend the Electric Service Quality Plan prospectively beginning with calendar year 2016.

COMM 1-5

Request:

This question relates to Page 4 of the Settlement Agreement which states the following,

“Except as modified by this Agreement, the 2007 SQ Plan remains the same as currently in effect.”

- a) Is the Company seeking approval of the Settlement Agreement and the Amended Service Quality Plan?
- b) Assuming approval is requested for both the Settlement Agreement and the SQ Plan, and assuming both documents are approved by the Commission, do you agree that the approved Service Quality Plan would supersede any plans previously approved by the Commission, including the 2007 SQ Plan referenced in Paragraph 3, page 4, of the Settlement Agreement?
- c) If the Company is seeking approval of a new SQ Plan which will supersede all prior service quality plans approved by the Commission, why is it necessary to reference an outdated SQ Plan in the Settlement Agreement?
- d) Do you agree that when an individual wishes to consult the currently effective Service Quality Plan that he/she should only need to reference one document, and not multiple plans or documents?
- e) Does the Company believe the proposed SQ Plan is full and complete to the extent that it addresses all necessary aspects of the new service quality plan, including all appropriate performance standards and penalties? If so, why is it necessary to refer to the 2007 SQ Plan in the Settlement Agreement?
- f) If the proposed SQ Plan is not full and complete, and does not address all necessary aspects of the Plan, shouldn't the Company modify the proposed SQ Plan to incorporate any provisions from the 2007 SQ Plan, or any other provisions which are necessary in order to fully and completely cover all aspects of the newly proposed SQ Plan in one, single document?

Response:

- a) Yes, the Company is seeking approval of the Settlement Agreement, which includes the Amended Service Quality Plan as an attachment and is incorporated by reference. Therefore, the Company is also seeking approval of the Amended Service Quality Plan.
- b) Yes, the Company agrees that, if approved, the Amended Service Quality Plan would supersede any plans previously approved by the Commission, including the 2007 Service Quality Plan.

COMM 1-5, page 2

- c) The language cited above was added to the Settlement Agreement to make it explicit that except for the changes to which the parties to the Settlement Agreement have agreed, all other provisions of the currently effective 2007 Service Quality Plan remain the same. If the Commission approves the Settlement Agreement and Amended Service Quality Plan, then the Amended Service Quality Plan would become the currently effective Service Quality Plan.
- d) Yes, the Company agrees with that statement. See subpart (c) of this response.
- e) Yes, the proposed Amended Service Quality Plan is full and complete, and addresses all necessary aspects of the new service quality plan, including all appropriate performance standards and penalties. Once approved by the Commission, there will no need to refer back to the 2007 Service Quality Plan. Please see subpart (c) of this response for why reference to the 2007 Service Quality Plan was included in the Settlement Agreement.
- f) The proposed Amended Service Quality Plan incorporates all necessary provisions to fully and completely cover all aspects of the Service Quality Plan. Please also see subpart (e) of this response.