

REBUTTAL TESTIMONY

OF

KAREN M. CZAPLEWSKI

I. INTRODUCTION

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Karen M. Czaplewski and my business address is 280 Melrose Street,
3 Providence, Rhode Island 02907.

4 **Q. WHAT IS YOUR POSITION WITH THE COMPANY?**

5 A. I am currently Director of Call Center Integration for National Grid Rhode Island
6 – Gas ("National Grid" or the "Company"). Prior to the sale of Southern Union
7 Company's Rhode Island gas distribution assets to National Grid, I was Vice
8 President of Customer Service for New England Gas Company. Through both of
9 these positions, I have gained a comprehensive understanding and expertise with
10 the Company's customer information systems and billing, collection and
11 termination practices.

12 **Q. WOULD YOU BRIEFLY REVIEW YOUR BACKGROUND AND**
13 **QUALIFICATIONS?**

14 A. Yes. Prior to becoming the Vice President of Customer Service for New
15 England Gas Company, I managed the customer-service operations for other
16 operating divisions of Southern Union, which were located in Texas and
17 Missouri. In Missouri, I worked closely with the Missouri Public Service
18 Commission to design and implement a performance-based service-quality

1 program. I also belong to several trade organizations and professional
2 associations relating to the customer-service field.

3 **Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS**
4 **PROCEEDING?**

5 A. No. I have not.

6 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

7 A. On August 6, 2008, the George Wiley Center (“Wiley Center”) filed comments on
8 a number of low-income issues under discussion in this proceeding. My rebuttal
9 testimony addresses a factual assertion made by the Wiley Center in its pre-filed
10 comments at page 4 (and related footnote 5). My rebuttal testimony responds
11 only to this issue, but my silence on any other issues set forth in the Wiley Center
12 comments should not be construed as agreement with any particular
13 recommendation.

14 **Q. WHAT IS THE FACTUAL ASSERTION THAT YOUR TESTIMONY IS**
15 **ADDRESSING?**

16 A. On page 4 of the Wiley Center’s pre-filed comments, the assertion is made that
17 “[i]n the last three years, 16,204 accounts were never restored at all.” For the
18 reasons discussed below, this statement is not accurate.

1 **Q. WHAT ARE THE REASONS THAT CUSTOMER ACCOUNTS MAY NOT**
2 **SHOW ON THE COMPANY’S SYSTEM AS “RESTORED”?**

3 A. The Wiley Center addresses this issue in a footnote [fn.5] that “while NG
4 speculates that some terminated customers are choosing not to restore gas service
5 over the summer. . . this too appears to be the product of speculation, not
6 investigation.” However, the Wiley Center states that it has taken its information
7 from the Company’s response to Data Request WILEY 2-4. In that data request,
8 the Company provided an explanation as to the reasons that the number of
9 customer accounts shown as “terminated” on the Company’s customer-
10 information service is not indicative that the customer premise involved is
11 remaining without service. The Company explained in its response to Data
12 Request WILEY 2-4 that there are many reasons that some customers do not
13 request restoration of service following a termination including: relocation to
14 another service territory (e.g., college students); a change in the customer’s fuel
15 source, service is initiated under another customer name, or the customer chooses
16 to wait to address the account balance when there is a need for heat once again.
17 Lastly, the Company notes that customers who typically are shut off outside of
18 the moratorium would have their service restored upon the onset of cold weather
19 when they can financially afford the required down payment or qualify for some
20 type of assistance.

1 **Q. HAVE YOU RESEARCHED THE STATUS OF THE 16,204 CUSTOMER**
2 **ACCOUNTS REFERENCED BY THE WILEY CENTER AS**
3 **TERMINATED OVER THE LAST THREE YEARS WITHOUT SERVICE**
4 **RESTORATION?**

5 A. Yes. Since receiving the Wiley Center’s pre-filed comments, I researched the
6 issue by checking to see whether service was restored at the premise address for
7 any of the 16,204 “customer accounts” referenced by the Wiley Center. In other
8 words, customer accounts are maintained by customer name. However, by
9 checking to see whether service was restored at any of the 16,204 premises, the
10 Company could confirm whether the 16,204 customer accounts terminated over
11 the last three years, in fact, never had service restored. The Company found that
12 since the date of service termination during the three-year period April 1, 2006
13 thru March 31, 2008, the number of premises without restoration over the three
14 years was only 2,833. Service for the remaining 13,371 customer accounts was
15 restored in a different name than the name in which it was turned off. The
16 Company does not anticipate that a very large number of customers experiencing
17 shut-offs never receive restored service at the premise location, although the
18 Company cannot say that it does not happen for one reason or another.

19 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

20 A. Yes.