

**STATE OF NEW YORK  
BEFORE THE  
PUBLIC SERVICE COMMISSION**

**KeySpan Gas East Corporation d/b/a National Grid** :  
**Customer Service Transition Update and Notice of Intent** : **Case No. 13-G-0371**  
**to Relocate Call Center** :

**MOTION FOR HEARINGS AND INTERIM RELIEF**

International Brotherhood of Electrical Workers, Local Union 1049 (“Local 1049”) which represents approximately 2,550 workers in electric, generation and gas operations of National Grid hereby petitions the State of New York Public Service Commission to hold evidentiary hearings in this case and for interim relief barring any relocation of customer assistance services pending a hearing pursuant to Public Service Law § 65(13) and a final decision by the Commission. Local 1049 requested party status in Matter No. 13-01442 on September 5, 2013 and in this case on December 3, 2013.

Collectively, National Grid employees have a multitude of years of experience in working on Company and LIPA facilities and interacting with customers in a coordinated fashion. The structure under the present relocation proposal would radically change or eliminate the direct dealing with customer needs, especially in dealing with emergency situations. Given the proposed radical bifurcated electric and gas operations restructure, coupled with a proposed transfer of customer service to offices off Long Island, Local Union 1049 maintains that the quality and reliability of the services provided under proposed arrangements would be significantly less than what is being provided to customers today. The proposed operating environment is one in which significant and statutorily-mandated customer services would be provided by personnel likely not familiar with either the customers or geographic territory.

Local 1049 believes that the Commission should take immediate action to protect the safety, reliability and adequacy of utility service on Long Island going forward into the future through the initiation of hearings to determine the impacts on the customers of National Grid. While there have not yet been any catastrophic service failures, in order to reduce potential tragedies affected by inadequate customer assistance and service,<sup>1</sup> there is no reasonable basis for the Commission to stand down until one occurs. Indeed, in addition to the procedures required by statute, Commission on its own initiative has taken strong action in the past to prevent utilities from closing customer service offices and relocating customer assistance services. See

- *CASE 03-M-0380 - Proceeding on Motion of the Commission to Investigate New York State Electric & Gas Corporation's Proposal to Close its Customer Service Centers. ORDER INSTITUTING PROCEEDING AND DIRECTING NEW YORK STATE ELECTRIC & GAS CORPORATION TO SUSPEND CLOSURE OF ITS CUSTOMER SERVICE CENTERS* (One-Commissioner Order by Chairman Flynn Issued and Effective March 24, 2003);<sup>2</sup>
- *CASE 02-M-1465 - Proceeding on Motion of the Commission to Investigate Rochester Gas and Electric Corporation's Proposal to Close its Customer Service Centers. ORDER DIRECTING ROCHESTER GAS AND ELECTRIC CORPORATION TO SUSPEND CLOSURE OF ITS CUSTOMER SERVICE CENTERS*. (One Commissioner Order by Chairman Helmer Issued and Effective December 3, 2002);<sup>3</sup> and
- *CASE 99-M-0851 - Joint Petition of the Public Utility Law Project of New York, Inc., Local 1-2 of the Utility Workers of America, A.F.L.-C.I.O., and Save Our Services for a Commission Order that Consolidated Edison Company of New York, Inc. Cease Closing Customer Service Offices and Re-Open Customer Service Offices Already Closed. ORDER APPROVING JOINT PROPOSAL* (Issued and Effective March 27, 2001).<sup>4</sup>

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<sup>1</sup> See New York's Utility Project Blog, *Fire Kills 3 Boys After Con Ed Shut Power Off to Collect Unpaid Bill and Mom Used Candles*, October 26, 2013, available at [http://pulpnetwork.blogspot.com/2013\\_10\\_01\\_archive.html](http://pulpnetwork.blogspot.com/2013_10_01_archive.html).

<sup>2</sup> Available at <http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={F69B8CFE-474B-49FD-B334-DDD7A95B4C07}>.

<sup>3</sup> Available at <http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={248337CA-23F9-4798-B428-634DF7701FB3}>.

<sup>4</sup> Available at <http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={3681DB7D-DAAF-4861-8EF8-03B337CB6F33}>.

## FACTUAL BASIS FOR REQUESTED RELIEF

This case concerns a proposal by KeySpan Gas East Corporation d/b/a/ National Grid (“KeySpan East” of “KEDLI”) to close its Melville customer service call center and, after a time in a temporary location, to relocate the call center outside the KeySpan East service territory to the offices of its affiliate, KeySpan New York, at Metro Center in Brooklyn, to be staffed by non-KEDLI personnel there.<sup>5</sup> KeySpan East also proposes to eliminate all customer assistance now provided by KeySpan East employees, (except for the receipt of payments), at eight of its eleven customer services offices,<sup>6</sup> and to relocate that assistance to the remaining three customer service offices on Long Island. The call center is proposed to be relocated to Brooklyn. The company promises it will continue to receive payments at eight offices and provide the full range of customer assistance at three of the eleven offices, but for a two year period only.<sup>7</sup>

No petition was filed seeking a Commission Order approving the proposed changes, seeking any change in tariffs which reference availability of services now provided at the eleven customer assistance offices, or seeking modification of the rate plan in effect, which implicitly provides for continued operation of the call center and full operation of the eleven offices.<sup>8</sup> Notice of intent to reduce services at the eight customer service offices was not provided to all parties in the last proceeding which established rates, terms and conditions of service now in effect. Rather, the

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<sup>5</sup> “Effective January 1, 2014, National Grid will turn over management of LIPA’s electric system to PSEG. As part of the transition, the Melville Call Center, as well as most of National Grid’s call center employees, will be transferred to a subsidiary of PSEG so it can provide services to LIPA’s customers.” KeySpan Letter to Commission Secretary dated July 3, 2013., available at <http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={70E64142-8AE0-49FA-A854-F476E6295095}>.

<sup>6</sup> “There are currently eleven walk-in customer offices on Long Island, four in Nassau County (Bellmore, Hicksville, Hewlett and Roslyn) and seven in Suffolk County (Bridgehampton, Riverhead, Patchogue, Coram, Brentwood, Babylon and Melville), serving KEDLI/LIPA customers.” KeySpan East Letter to Commission Secretary dated July 3, 2013.

<sup>7</sup> “KEDLI is currently negotiating a transition agreement with PSEG for a period of twenty-four months for the eleven current offices.” KeySpan Letter to Commission Secretary dated July 3, 2013.

<sup>8</sup> KEDLI invokes the loss of synergies and higher costs of maintaining existing customer assistance services due to the impending exit of National Grid as manager of LIPA operations, its replacement by PSEG, and the separation of customer service functions. KEDLI does not explain in its submissions why it did not file a petition for deferral of the added costs due to loss of synergies which were not anticipated when current rates were set.

proposals to relocate customer assistance are contained in a letter to the Commission Secretary dated July 3, 2013, styled as a “*Customer Service Transition Update and Notice of Intent to Relocate Call Center.*” In a second submission on November 19, 2013, KEDLI submitted a memorandum indicating that ten employees will be added to the remaining three customer service offices that will provide assistance other than the receipt of customer payments.<sup>9</sup> There is no indication of the change in the number of employees providing customer assistance at the eight offices where only payments will be received.

The November 19 submission indicates how customer assistance now provided by KEDLI staff at its eight community offices will be relocated and provided by new staff at the call center office outside the service territory:<sup>10</sup>

KEDLI’s Long Island gas customers will be able to make payments at the same offices used today for at least two years following the LIPA transition. In addition to the dedicated KEDLI interviewers at the three busiest offices, KEDLI will install courtesy phones at each location not staffed by a dedicated interviewer that will allow customers to talk directly to the Contact Center to handle all customer transactions.

Thus, customer assistance services would be relocated to a call center outside the service territory at eight of the eleven Long Island community offices. Customers seeking assistance at the eight offices would need to obtain it instead from the distant call center office.

There is no information in the KEDLI submission regarding the characteristics of customers who come to the eleven community utility offices for services. While there is an indication that most of the traffic is related to payments, there is no analysis whether, for example, these are payments made to avert imminent service termination. And, there is no assessment whether a “courtesy phone”

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<sup>9</sup> *KEDLI Transition Update* filed November 19, 2013, available at <http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={31EA3AE2-8488-4FCE-A1D2-D1C350D41D0F}>.

<sup>10</sup> The November 19 filing also states that it “is no longer proposing to outsource connect/disconnect calls as discussed in its July 3, 2013 filing.”

to the call center in the eight offices that would no longer provide customer assistance would be adequate service to those who, for example,

- are hard of hearing,
- who have difficulty in speaking clearly,
- who have limited language abilities,
- who are not literate and need to discuss the meaning of documents they received and have brought in,
- who are required to provide written applications or to sign papers
- who have other mental or physical limitations that make it difficult for them to transact business by phone
- who cannot afford or have difficulty in copying, scanning, faxing or mailing documents.

There is no indication that any community input was sought or considered by KeySpan East before deciding to cut the face to face assistance services provided at the office and relocate the service provision to the call center office. Rather, the action is being presented as the only possible option after loss of putative synergies with LIPA, without consideration of alternatives. It is being sold to the community as a *fait accompli* in a lavish advertising campaign weaving in the customer service reduction and relocation along with more routine messages:

National Grid is involved in an ongoing customer outreach **campaign intended to keep Long Island gas customers fully informed of the changes** resulting from the LIPA transition. This outreach includes direct communication with customers, through bill inserts and messages, office signage, web content, targeted mailings and outbound calls, regarding the changes to KEDLI's bill format, the conversion to a new customer system, **the customer offices** and automated meter reading.

The Company is launching an advertising campaign in December to inform customers about their new gas bill while reaffirming KEDLI's commitment to Long Island. Radio and print advertising along with social media will be used to reach customers. In the

weeks leading to the transition, advertising will address the LIPA transition and other important messaging, including: gas safety, help with high winter bills and other customer programs.<sup>11</sup>

### **THE SAPA NOTICE**

The Secretary filed the July 3, 2013 KEDLI letter on July 5 and opened Case 13-G-0371, classifying it as a Petition. On September 11, the Commission issued a SAPA Notice of Proposed Rulemaking, identifying the Proposed Action to be “The Commission is considering a notice of intent by KeySpan Gas East Corporation d/b/a National Grid to relocate a call center to another area of New York State.” The substance of the Notice addresses relocation of the call center relocation only. No SAPA Notice was issued regarding the KeySpan East proposal to end the provision of any customer service (other than receipt of payments) at eight Long Island offices and to relocate the provision of those services to the other three offices (at Bellmore, Brentwood and Hewlett) and the call center outside the service territory. The SAPA Notice is attached to this motion. The statutory authority for Commission action identified in the Notice is PSL § 5 and § 65(13).

### **PUBLIC SERVICE LAW**

The Public Service Commission powers are defined and limited by the Legislature in the Public Service Law. The issue of relocation of customer assistance and call center offices has been specifically addressed by the Legislature. PSL § 65(13), identified as a source of authority for the action proposed in the SAPA Notice, provides:

13. (a) Every gas corporation or electric corporation furnishing utility services shall provide the following call center customer assistance receiving inquiries on: customer financial responsibility; receiving requests to initiate or terminate service; receiving requests for emergency services; determining deposit required or billing rate; receiving meter and service orders and access to meter requests; explaining company rates, regulations, policies, procedures, and common practices; initiating trouble order forms and high bill investigations; handling payment and other credit

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<sup>11</sup> KEDLI November 19, 2013 Update.

arrangements such as obtaining deposits, financial statements and payment plans; and referring customers to social service agencies and other assistance programs.

(b) No gas or electric corporation shall close a call center **or other facility providing the customer assistance set forth in paragraph (a)** of this subdivision **or relocate such customer assistance** to another area of New York state or outside of New York state without notice and hearing before the commission.

The eleven KEDLI offices now in operation are

- receiving inquiries on: customer financial responsibility;
- receiving requests to initiate or terminate service;
- receiving requests for emergency services;
- determining deposit required or billing rate;
- receiving meter and service orders and access to meter requests;
- explaining company rates, regulations, policies, procedures, and common practices;
- initiating trouble order forms and high bill investigations;
- handling payment and other credit arrangements such as obtaining deposits, financial statements and payment plans; and
- referring customers to social service agencies and other assistance programs

Thus, they are “facilities providing the customer assistance set forth in paragraph (a) of the statute.

And, the KEDLI proposal is to relocate that assistance to the remaining three community offices or to the call center office proposed to be created outside the service territory at the location of a corporate affiliate. Accordingly, under the statute, these services cannot be relocated “without notice and hearing before the commission.”

The SAPA Notice for the call center relocation previously discussed says “No Hearing Scheduled” and there is no SAPA Notice at all for the relocation of customer service assistance from eight Long Island offices to the other three offices and the call center. The notice and hearing requirement of § 65(13)(b) clearly applies to the call center relocation and elimination at 8 offices of all customer assistance services except receipt of payments. Accordingly, the plan should be halted and services at the eight offices continued pending adequate public notice, and a Commission decision after a “hearing before the Commission.”

Because there is a need to assess whether the reduction of services provided by eight of the eleven customer service facilities is just and reasonable, and whether service to vulnerable customers will be adequate, there should be an evidentiary hearing. The utility should bear the burden of proof to show its action is just and reasonable in all respects, and should be required to prefile testimony and evidence in support of its action which includes consideration of alternatives, the costs, the characteristics of customers seeking assistance at the offices, the type of services provided, whether the services provided involve the termination or reconnection of services,<sup>12</sup> and the impact on customers and the communities of relocating assistance services now provided at eight offices to three other offices and the call center.

Electric and gas utility companies have the statutory obligation to “furnish and provide such service, instrumentalities and facilities as shall be safe and adequate and in all respects just and reasonable.” Public Service Law § 65(1). The shunting of customers who previously would have received assistance services at eight local offices to three possibly distant offices and a call center raises the issue whether the customer service proposed to be provided by the company is “adequate.” These statutory obligations are to be satisfied for the benefit of Long Island customers and employees, who include members of Local 1049 and their families. The Company’s obligations are also independent of any circumstances in which violations occur; they are neither put in suspension nor held in abeyance because they arise in the context of a labor or other dispute. The Commission implicitly found the array of customer service assistance provided at the eleven KEDLI offices to be adequate under PSL § 65(1) when the Commission last set rates. The proposed change calls the adequacy of service into issue, and the statute requires adequate notice and an opportunity for a

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<sup>12</sup> Under the Home Energy Fair Practices Act, it is the “policy of this state that the continued provision of . . . gas, electric and steam service to all residential customers without unreasonable qualifications or lengthy delays is necessary for the preservation of the health and general welfare and is in the public interest.” Pub. Serv. Law § 30.



hearing before the Commission prior to any approval of the action.<sup>13</sup> While the definition of what is “adequate” service may in some instances be imprecise, a plan to operate utility offices only to take money from customers and to halt the longstanding provision of any other assistance does not offer "adequate" service to the public and customers under PSL 65. The Commission also should examine whether the proposal to continue the provision of customer service at three of the eleven community offices, while relocating the assistance services from the other eight offices, is discriminatory. The Public Service Law imposes stringent universal service duties that prevent unequal services to certain localities based on simplistic efficiency measures, and may require spreading of higher costs in some localities among all customers in order to achieve parity of service within the service territory. PSL § 65(3) provides:

3. No gas corporation, electric corporation or municipality shall make or grant any undue or unreasonable preference or advantage to any person, corporation or locality, or to any particular description of service in any respect whatsoever, **or subject any particular person, corporation or locality or any particular description of service to any undue or unreasonable prejudice or disadvantage in any respect whatsoever.**

Under KEDLI’s proposal, persons and localities now served by eight of the eleven offices providing customer assistance will no longer receive services other than the receipt of payments. There is a fleeting reference in the KEDLI submissions that the busiest three offices that recently had 53% of customer visits will be open for customer assistance, but no justification for halting customer

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<sup>13</sup> Even if KEDLI in good faith mistakenly relied on Department of Public Service staff in proposing the relocation of customer assistance services at eight offices without notice, the statute requires the Commission to give notice and hold a hearing and the Commission, not DPS staff, must decide the matter. In circumstances where another utility embarked on an unlawful course of action after conferring with Department of Public Service Staff, the Commission stated: “The record suggests that the company disclosed its plan for a lease-based policy to the Department and was never specifically told it could be illegal; the record also shows that the company never specifically asked the Department if the policy was legal. In arguing that the company had good cause to deny utility service to residential customers under the lease-based policy, Niagara Mohawk and Staff rely on the Department's silence, which, in our view, is not a strong position from which to argue good faith or due diligence.” *CASE 03-M-0772 – Petition of Niagara Mohawk Power Corporation for Authorization to Request Security Deposits from Applicants for Residential Service*, filed in C 25695. ORDER ON RESIDENTIAL SECURITY DEPOSITS (Issued and Effective March 25, 2004), at p. 13. Available at <http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={E2AAF5F7-226A-46AA-804A-7A0EA819FE38}>

assistance at the other eight that had served 47% of customers seeking in-person assistance.<sup>14</sup> There is no analysis of the number of customers served, the types of services provided, the cost per service, whether the services involve continuation of services about to be shut off, or restoration of services, or whether the alternatives proposed will disadvantage or prejudice vulnerable customers. Thus, customers and localities now receiving customer assistance services from offices in Bellmore, Brentwood and Hewlett will not be affected while approximately 47% of the customers once served by the other eight offices will be disadvantaged.

KEDLI tariffs in numerous instances reference the availability of certain services at any company office.<sup>15</sup> It would be disingenuous for KEDLI to claim that the substitution of “courtesy phones” linked to a Brooklyn call center at eight of these offices is not a change in tariffed service and not a relocation of customer assistance from the walk-in office to the call center. The KEDLI request, however, does not seek to modify the tariffs, which are binding under the filed rate doctrine, and which were approved in the last rate case when the revenue requirement was established with the implicit assumption that full customer assistance services would remain available there. The location of the customer assistance function is the location of the company staff providing it, and clearly that

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<sup>14</sup> See KEDLI’s November 19, 2013 submission, which indicates the percentage of customer visits for each of the branch offices.

<sup>15</sup> For example, the form deferred payment agreement in KEDLI tariff in PSC No. 1 Leaf 92, adopted July 1, 1999 indicates where repayment terms can be negotiated by a customer facing service termination for unpaid bills:

OFFICES: Open 8:30 a.m. to 5:00 p.m., Monday to Friday, except holidays.  
Bellmore - 2400 Sunrise Hwy., 11710  
Brentwood - 1650 Islip Ave., 11717  
Bridgehampton - Montauk Hwy., 11932  
Coram - 2045 Route 112, 11776  
Hewlett - 455 Mill Rd., 11557  
Hicksville - 175 E. Old Country Rd., 11801  
Melville - 1800 Old Walt Whitman Rd., 11747  
Patchogue - 460 E. Main St., 11772  
Riverhead - 117 Doctors Path, 11901  
Roslyn Heights - 250 Willis Ave., 11704  
West Babylon - 510 Park Ave., 11704

is proposed to be relocated from the eight of the offices listed in the tariffs to the three local offices and to an office in Brooklyn under the proposal.

The cost of providing the longstanding customer assistance services at the eight offices when rates were last set implicitly is covered by the rates set in the existing rate plan. The performance based rate plan in theory gives the utility incentives to provide adequate service more efficiently and keep the savings, at least until the next rate review. It is not a license to reduce costs by reducing services to customers and keep the savings. KEDLI does not reveal what costs it may be saving by eliminating the provision of customer assistance services by the eight offices. It is suggested that the costs of maintaining those offices would increase due to the separation of LIPA/PSEG, but KEDLI has not quantified those costs, or explained why it cannot petition the Commission for deferral of any added costs incurred due to lost synergies, to be considered in the next rate case, and allowed if the costs from the unanticipated separation of LIPA services are material and reasonable. Without scrutiny of the cost claims the company may be using the PSEG transition as an excuse to cut staff providing customer assistance and retain the savings before rates are reset in future rate cases.

It is Local 1049's understanding that the Commission is responsible for ensuring that utility companies in New York fulfill their obligations, for investigating instances in which the utility may not be doing so, including expressly with respect to its "methods" of operation, and, in such instances, for "order[ing] such reasonable improvements as will best promote the public interest, preserve the public health and protect those using such gas or electricity and those employed in the manufacture and distribution thereof." PSL § 66(2). The current operational uncertainty due to the proposed bifurcation of operations between National Grid and PSEG Long Island cast doubt that the utilities' public service and statutory obligations will be adequately met. Local 1049 asserts that there is every reason to believe that the proposed bifurcation of electric and gas services will result in customers not

being able to receive “safe and adequate and in all respects just and reasonable.” Local 1049 further asserts that the bifurcated worker structure may have prospective dangerous effects on the Company’s customers in storm and emergency situations, and asks that the Commission act to enforce its statutory mandate and hold hearings to fully evaluate National Grid’s intention to relocate its Call Center from Long Island to the borough of Brooklyn.

The relief that is sought here is grounded in the statute and supported by Commission precedent, and accords with public utility law in general. It should also be noted that utility commissions in other jurisdictions, operating under regulatory regimes similar to the one in place in New York, have found that they have the power to ensure that utilities are adequately staffed with skilled personnel when necessary to protect quality of service. And they have found cause to exercise that power and protect customers in their jurisdiction from staffing/operating practices that threaten safety and reliability.

When faced with staffing issues that might impair the quality of service, utility commissions in numerous states have rejected arguments that such matters are subject to collective bargaining and therefore the exclusive domain of federal labor law. The Illinois Commerce Commission (“ICC”) went so far as to find that that it must have the authority “to touch upon matters that might also be reasonably characterized as labor-management relations matters,” as “[t]o hold otherwise would be to end the regulation of public utilities. Every act of a public utility is performed by someone, and in countless instances that person is managed by another someone.” *In Re N Shore Gas Co.*, Docket No. 07-0241, 2008 WL 631214, at \*290 (Ill. Commerce Comm’n Feb. 5, 2008). The West Virginia Public Service Commission chided parties for “reducing what [it] view[s] as quality of service issues to pro-union/pro-management arguments.” 2012 W. Va. PUC LEXIS 230, at \*8. The Connecticut DPUC rejected claims that its investigation into layoffs was not a proper subject for Department

action, concluding that its review and investigation had “in no manner interfered with any contracts between the Companies and their employees.” DPUC Investigation into the Contemplated Workforce Reductions by Conn. Natural Gas Corp., 279 P.U.R.4th 161, 167 (Conn. Dep’t Pub. Util. Control 2010).

### **CONCLUSION**

The proposed intent to relocate the customer service centers of National Grid has created a situation warranting evidentiary hearings regarding such operating practices and interim relief to prevent the reduction of customer service assistance at eight Long Island offices and the call center relocation. This situation is of great public import for the people of Long Island. This motion is not asking the Commission to mediate a labor dispute. It is instead petitioning the Commission to act in accordance with its statutory mandate and in recognition of the potentially inimical effects on utility service that the proposed relocation would have. As such, the Local Union 1049 respectfully requests that the Commission initiate and conduct evidentiary hearings into the quality, reliability, and safety of the utility customer service to be provided by National Grid having the responsibility to manage gas service operations for the benefit of gas utility customers on Long Island. The Union further asks that the Commission immediately direct KeySpan East to cease relocation of customer assistance services at eight local offices and relocation of its call center and hold hearings to determine the impact that the proposed relocation of the customer service centers on the quality, safety, reliability and adequacy of the gas service provided by National Grid to Long Island customers.

Dated: December 11, 2013

Ridgefield, Connecticut

Respectfully submitted,

**KODA CONSULTING, Inc.**

*s/ Richard J. Koda*

Richard J. Koda, Principal  
409 Main Street, Suite 12  
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On behalf of International  
Brotherhood of Electrical Workers,  
Local Union 1049

Attachment: September 11, 2013 State Register SAPA Notice

## Welcome to the online source for the New York State Register

9/11/13 N.Y. St. Reg. PSC-37-13-00006-P

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9/11/13 N.Y. St. Reg. PSC-37-13-00006-P

NEW YORK STATE REGISTER

VOLUME XXXV, ISSUE 37

September 11, 2013

RULE MAKING ACTIVITIES

PUBLIC SERVICE COMMISSION

PROPOSED RULE MAKING

NO HEARING (S) SCHEDULED

I.D No. PSC-37-13-00006-P

Relocation of Call Center by National Grid

PURSUANT TO THE PROVISIONS OF THE State Administrative Procedure Act, NOTICE is hereby given of the

following proposed rule:

*Proposed Action:*

The Commission is considering a notice of intent by KeySpan Gas East Corporation d/b/a National Grid to

relocate a call center to another area of New York State.

*Statutory authority:*

Public Service Law, sections 5 and 65(13)

*Subject:*

Relocation of call center by National Grid.

*Purpose:*

To consider notice by National Grid of call center relocation .

*Substance of proposed rule:*

The Commission is considering a notice of intent to relocate a call center by Key Span Gas East Corporation d/b/a National Grid (Grid). Grid will no longer be providing electric transmission and distribution services to Long Island electric customers beginning in 2014. This necessitates the separation of Grid's gas from electric customer functions on Long Island. Grid has developed a comprehensive customer service plan to maintain service quality levels and mitigate the cost impacts to

customers resulting from the transition. For its gas customers, Grid proposes the transition from the Melville call center to an existing Grid customer call center in Brooklyn, NY. The existing Grid/LIPA call center in Melville for Long Island Power Authority electric customers will be maintained. The Commission may accept, reject, or modify Grid's petition in whole or in part.

*Text of proposed rule and any required statements and analyses may be obtained by filing a Document Request Form (F-96) located on our website <http://www.dps.ny.gov/f96dir.htm>. For questions, contact:*

Deborah Swatling, Public Service Commission , 3 Empire State Plaza, Albany, New York 12223-1350, (518) 486-2659, email: [Deborah.Swatling@dps.ny.gov](mailto:Deborah.Swatling@dps.ny.gov)

*Data, views or arguments may be submitted to:*

Kathleen H. Burgess, Secretary, Public Service Commission , 3 Empire State Plaza, Albany, New York 12223-1350, (518) 474-6530, email: [secretary@dps.ny.gov](mailto:secretary@dps.ny.gov)

12/3/13 New York State Register

*Public comment will be received until:*

45 days after publication of this notice.

*Regulatory Impact Statement, Regulatory Flexibility Analysis, Rural Area Flexibility Analysis and*

*Job Impact Statement*

Statements and analyses are not submitted with this notice because the proposed rule is within the definition contained in section 102(2)(a)(ii) of the State Administrative Procedure Act.

(13-G-0371SP1)

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