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September 29, 2008

VIA OVERNIGHT MAIL

Honorable Jaclyn A. Brillling
Secretary
State of New York
Public Service Commission
Three Empire State Plaza
Albany, New York 12223-1350

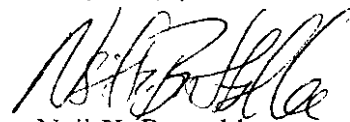
Re: Case 05-S-1376 – Proceeding on Motion of the Commission as to the Rates,
Charges, Rules and Regulations of Consolidated Edison
Company of New York, Inc. for Steam Service.

Dear Secretary Brillling:

The Commission's September 22, 2006 Order Determining Revenue Requirement and Rate Design in the above-referenced proceeding required Consolidated Edison Company of New York, Inc. ("Con Edison" or the "Company") to "conduct a survey of Industry Representatives with whom SBD [Steam Business Development] personnel met/contacted to obtain and evaluate their reaction to the Company's business development implementation efforts." The Order also required the Company to "prepare and file with the Commission a report on the results of this survey on or before September 30, 2008."

Accordingly, enclosed please find an original and five copies of Con Edison's report on "Steam Customer Perceptions - 2008 Industry Representative Follow-up Findings." Please contact me if you have any questions regarding this matter.

Very truly yours,



Neil H. Butterklee

cc: Active Parties (via e-mail)



**Con Edison Steam Customer Perceptions
2008 Industry Representative Follow-up Findings**

Prepared for
Con Edison
New York, NY

18 August 2008

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Executive Summary

Con Edison is committed to enhancing the value it provides to its customers. As a follow-up to one-on-one meetings with key customers, Con Edison asked CRA, Inc. to conduct a survey of these industry representatives and evaluate their reactions to Con Edison's efforts undertaken to address the key issues identified during stakeholder conversations.

In July 2008, the research team completed 33 phone interviews with industry representatives. This report details the findings.

Summary of Findings

The following provides an overview of the findings:

- An overwhelming 94 percent of participants provided favorable responses when asked to rate their overall perceptions of Con Edison's steam service. Specifically, 57 percent are *very favorable* and an additional 37 percent are *somewhat favorable*. Only 7 percent rated their perceptions as *unfavorable*. Participants who responded very favorably are satisfied with reliability of the service and the responsiveness of Con Edison contacts; they also appreciate Con Edison's efforts to satisfy customers. Somewhat favorable respondents noted that Con Edison staff could be more responsive to their needs, with some mentioning unresolved issues. A number of respondents expressed concerns about steam costs and the outdated infrastructure.
- Most respondents reported that they are aware of Con Edison's efforts to improve communication with customers about steam issues. They saw advertisements and information on the website and received information through mailings, emails, and phone calls. They mentioned seminars and other educational opportunities, although some expressed need for more information.
- More than half of respondents said they are aware of Con Edison's efforts to address concerns about steam costs, saying they received information during seminars and through other means. Participants also mentioned consultation and system audits, and acknowledged Con Edison's efforts to provide innovative pricing packages and options. However, some would like to hear more on this topic. Participants are unaware of efforts to address costs expressed concerns about the cost of steam.
- More than half of respondents reported they are aware of Con Edison's efforts to address demand billing issues. They received information through various means and appreciate Con Edison's efforts to educate customers. Respondents who said they are

unaware of efforts in this area expressed the need for more information.

- More than 40 percent of participants indicated that they are aware of Con Edison's efforts to address issues related to steam cooling. Those familiar with the efforts received information through meetings, seminars, and other means, but others said more needed to be done for steam cooling to become a viable alternative.
- One-third of respondents reported awareness of Con Edison's efforts to improve assistance to customers in attaining "green" building status. Those who are unaware of efforts in this area expressed their interest in protecting the environment and a desire for more information.
- When asked about Con Edison's efforts to address the potential for Combined Heat & Power systems, nearly one-third said they were aware of initiatives in this area. Industry representatives unaware of these efforts said they needed more information and would like to see Con Edison do more, particularly to address costs.

Introduction

In order to collect and evaluate customer perceptions of Con Edison's efforts to address key issues related to steam service, Con Edison asked CRA, Inc. to conduct follow-up interviews with industry representatives with whom Con Edison had conducted meetings during the previous year.

Methodology

- The research team designed a comprehensive interview guide tailored to explore and evaluate participants' awareness of and reactions to Con Edison's efforts to address key issues raised in stakeholder conversations: i.e., customer communication, steam costs, demand billing, steam cooling, assistance to customers for attaining "green" building status, and potential for Combined Heat & Power systems.
- For each area of concern, the survey asked participants to indicate whether or not they were aware of Con Edison's efforts to address the issue. The survey included follow-up questions to elicit descriptions of those efforts or suggestions for improvement.
- The survey also asked participants to rate their overall perceptions of Con Edison's steam service and to elaborate on their rating. At the close of the interview, participants had the opportunity to provide additional comments.
- In July 2008, the research team made multiple efforts to contact industry representatives from a list of contacts supplied by Con Edison. Over a period of three weeks, the team completed 33 phone interviews, collecting data from 10 Architects and Engineers, 12 Owners and Developers, and 11 Chief Engineers.
- The research team performed descriptive and qualitative analyses of collected data to summarize and evaluate customers' perceptions.

Report Structure

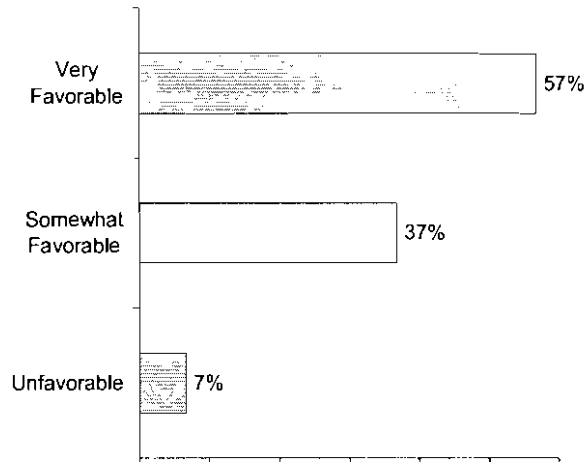
The report presents the findings in two sections:

- Perceptions of Con Edison Service
- Perceptions of Efforts to Address Key Issues

Perceptions of Con Edison Service

57% Very Favorable
37% Somewhat Favorable
7% Unfavorable

Respondents rated their overall perceptions of Con Edison's steam service.



As shown, an overwhelming 94 percent of participants offered favorable ratings, with 57 percent reporting their perceptions are *very favorable* and an additional 37 percent saying their perceptions of Con Edison's steam service are *somewhat favorable*. Only 7 percent rated their perceptions as *unfavorable*.

To elicit further context, the survey asked participants to explain their rating. Thematic analysis of their responses identified the following themes presented below with illustrative comments:

Participants are very satisfied with dependability of steam service and convenience of the technology:

- Most of the Manhattan facilities are using it and relying on it, and I haven't heard of any major problems. Once in a while, there are maintenance necessities and they have to shut the service down, but there haven't been any big interruptions.
- This is the first year that I've worked with steam in New York City. In the past, I used to hear how dangerous steam is, and sure, it's a little dangerous, but it's pretty efficient, clean, and dependable.
- Steam is always there; it's a constant source, and it gives me more storage. I can use a newer water system, and it makes my whole operation easier.

Participants who are *very favorable* also expressed satisfaction with responsiveness of Con Edison's steam personnel:

- We've never had a problem. We call the 800 number and are serviced in 45 minutes to an hour. We've never had somebody say they were going to come and not come.
- They keep up on work and check pipes. They come quickly and are on top of things.
- We are a huge user and representatives get back to us very quickly.

Respondents who provided *very favorable* ratings appreciate Con Edison's efforts to satisfy customers:

- It's a never-ending battle to keep people happy, but Con Edison does a good job. Their web site and courses are helpful. When I attended the one-day seminar, the Con Edison steam people left their cards and encouraged us to contact them with questions. Con Edison also approved me to take an Electricity Distribution class that is helpful.
- I think they do a tremendous job. They deal with a lot of adversity with the cost being so high. They're like a landlord; they do their best. They do their best to keep the prices low.
- Wish there was something in between "very favorable" and just "favorable" to choose from! I think Con Ed could use technology more to keep everyone updated. Auto-paging and auto-email would be great ways to keep people informed. However, Con Ed has great people who are always helpful.

Con Edison representatives need to be more responsive to customer needs, according to *somewhat favorable* participants; some of them also mentioned unresolved issues:

- Con Edison is in almost every building I have. I tell them when I'd like to shut down, and they tell me when they can shut down, and the two don't always match. For example, the number of guests at the hotel is low right now, and I have the opportunity to change the gaskets, but Con Edison doesn't. I called them, and they don't have someone on their end who is available to shut off steam.
- Sometimes it's very painful working with Con Edison. They act like it's their way and their schedule or nothing. They're very busy, which is clear. Be a little more customer-centric, as opposed to "You have no choice."
- Disappointed with issues created that they haven't fixed.
- We had some issues before, some of which are still unresolved. We have three lines: medium, low, and high. The low side was removed but never replaced. They keep saying they'll replace it, but they never do. It's been several years. Also, they have people who come to read and check

the meters who said the meters were working fine, but now, two years later, they sent me a bill for over \$50,000, saying the meters had not been working correctly. How are you going to do that? Your people come and check the meters and say they're working fine, but then you send me a bill because they weren't working? Just recently the problem came up again. The meters were not working correctly, and they sent me another bill for a couple thousand dollars.

A number of *somewhat favorable* and *unfavorable* customers expressed concerns about steam costs and outdated infrastructure:

- Come up with a master plan to reduce costs.
- They are reliable, but costs are high; they need to do more to save steam even in their own system.
- There are areas they can address: in particular, keeping costs down.
- Having a district steam system is a valuable asset to Manhattan. Additional incentives would make me more favorable.
- I'm concerned about the infrastructure being very old and inefficient, and as a result, the customer pays a very high rate for steam. I'd like to know if there's a way of financing infrastructure improvements without putting the full burden on the customer. There needs to be a way to improve the reliability and efficiency of the system.

Perceptions of Efforts to Address Key Issues

The interviews focused on customer perceptions of Con Edison's efforts to address the following issues and concerns:

- Communication with customers about steam issues
- Steam costs
- Demand billing
- Steam cooling
- "Green" building assistance
- Distributed generation (Combined Heat & Power systems)

To provide context around customer perceptions of Con Edison's efforts to address these key areas of concern, the research team conducted thematic analyses of participants' responses where appropriate and provided example comments verbatim to support each theme.

The remainder of this section details these findings.

Customer Communication

Have you observed or heard about any efforts Con Edison has made to improve its communications with customers about steam issues?

85% Aware Most respondents, 85 percent, reported that they were aware of Con Edison's efforts to improve communication about steam issues and provided examples of what they observed in this area. Thematic analyses of their responses revealed the following themes presented below with illustrative comments:

Respondents mentioned advertisements and information on the website. They received mailings, emails, and phone calls:

- Newspapers and advertising.
- Have seen advertising on subway which is good for the average consumer. Got emails and seminars.
- Sent sample bills.
- Get literature in the mail.
- I have a customer service representative who calls.
- Emails, phone calls to end-users; I don't have any issues related to steam service.
- I've seen more communication coming from them. They've added staff in their marketing development group, I think, which has led to increased mailings.
- In the last couple of years there's been an increase in communication with steam customers on the web and in materials sent.

Respondents take advantage of seminars and other educational opportunities:

- Attended classes; we're sending all guys to classes this year.
- We went to a seminar at the Con Edison plant in Brooklyn. It was pretty informative.
- I recently took a one-day steam seminar that was spot-on with the issues we face and very helpful.
- Seminars to explain demand issues.
- I've been to a seminar and they gave a lecture on how to save steam.
- I've heard about a seminar and ways of saving and dealing with leaks. And they have come by to address issues.

Respondents are notified in advance about shutdowns and receive service updates:

- We receive letters and faxes regarding issues with efficiency and notifying us in advance of emergency shutdowns. When there's a shutdown, it's usually with adequate notice.
- They notify us of shut downs and send faxes.
- If there's a steam leak and we contact Con Edison, they'll update us on it.

Although aware of efforts in this area, some customers say they would like more information:

- I just know that it's available. I had another property where I put steam in, and it worked well because it saved space. I'd like to know how much it would cost to convert to and run steam so I can present return-on-investment information at my current building. My boilers are at the end of their life expectancy, so it would be good to know.
- In the mail, they send something with the bill. We have two buildings that use steam, and the owners are thinking of switching to electric. Anything they could send us would be helpful in making that decision.
- I've seen some literature in the mail, but that's it. I'd like to see more energy-saving issues addressed.
- Provide information updates on the website. We are able to contact account representatives easily when we need to, but there seems to be a gap between publicly available information and what information you can get directly from your representative.
- Talk about pricing. As far as steam, our consultants talk about increases in pricing.

Respondents who are unaware of efforts in this area provided the following comment, too few to theme:

- Steam leaking on sidewalk but took several attempts to fix. They dug up the sidewalk and left a metal plate up so people can trip.
- When try to reach customer service, I can't reach anyone or get a message
- How can you clean up to prevent the corrosive nature of steam from screwing up my systems? Con Edison wasn't too forthcoming. At first they said my setup was okay; then they said I need to have a vertical tank instead of a horizontal tank.
- Lower your rates.

Steam Costs

Have you observed or heard about any efforts Con Edison has made to address concerns about steam costs?

52% Aware More than half of respondents noted that they are aware of Con Edison efforts to address customer concerns about steam costs. Thematic analyses of their responses revealed three primary themes presented below with illustrative comments:

Respondents receive information on how to reduce steam costs during seminars, courses, and through other means, but some would like to hear more on this topic:

- They have a series of seminars.
- They hold seminars and request our attention. The seminars explain how to cut costs and save energy.
- There have been letters about increasing the efficiency of steam use and also surveys.
- They send out literature; check traps. They offer courses.
- There are several programs we've heard about to retain customers. It might be a good idea to send newsletters out to let us know of other things going on.
- I'm aware that they upgraded some electrical facilities, and that they're working in the streets more, just based on what I've seen. I'd like to hear about anything to bring down operational costs. I know they replaced the meters.

Con Edison provides consultation and system audits:

- We are in the process of changing our A/C system, and we addressed a couple questions to them. They assured us that steam is much better in terms of efficiency. In terms of cost, it's comparable, but it has better efficiency.
- Right now we're in the middle of a conversion. We were looking to centralize steam water heating. We looked into a micro-turbine, but we didn't have room for it. We use steam to heat water, but there was an issue with the water not getting as hot on the lower floors. They considered adding heaters for each floor.
- Con Edison gave us a free audit on our steam system, and we would like them to push it more through subsidies and other initiatives directed at improving efficiency of systems.

Con Edison is making an effort to provide innovative pricing packages and options:

- I've seen a lot of propaganda. I used to work in utilities, so I know working with rates is difficult. I think they're working hard at rates, trying to be innovative in rate setting.
- They are always promoting reduced impound rates, off-season usage, efficiency; they try to help customer save money.
- I've heard about the restructured cost system.

Respondents who said they were unaware of efforts in this area expressed concerns about costs and offered the following comments and suggestions:

- I'd like to know how we can save on steam consumption. We use a lot of steam.
- I'd like to hear more about finding a way to supply steam more efficiently.
- I have only heard hearsay. I would like to see the advantages and disadvantages of steam chillers as opposed to electric. Right now, it would be more cost effective for us to stick with steam because we already have it installed, but we'd like to know.
- Lower rates.
- It would be great if costs could be reduced. Then we'd have more people participate and publicize the value of steam.
- Everyone is nervous about increased cost. Education would be good.
- It would be nice if there was a way of updating us with projected costs, but I know it's heavily related to fuel costs.
- It's costing too much. There's a rate and a fuel surcharge, and those are set. There is no negotiating on cost.
- They do whatever they can to increase profits, and the customer comes last. They do a good job of pleasing shareholders, I'm sure, but the customer is last.

Demand Billing

Have you observed or heard about any efforts Con Edison has made to address demand billing issues?

53% Aware More than half of respondents said they are aware of efforts in this area and could recall examples of what Con Edison did to address these concerns. Thematic analysis of their responses identified the following themes presented below with illustrative comments:

Con Edison helps customers understand demand billing by providing information through seminars, publications, and other means:

- I think they've been trying hard. I know they have been doing demand billing. Before that, they offered parallel billing.
- They help people try to understand demand billing and work in a positive manner!
- They have educational seminars and send out publications.
- I have attended a seminar.
- They had a seminar two years ago, and I spoke at it.
- They offer seminars and education; they explain what end-users can do.
- This is always an issue; developers always have questions. There are never enough explanations you can give them although they try to answer all questions. Maybe Con Edison could provide a quick recap about how it works, how it activates, and when the demand meter kicks in that would help developers better understand.

Some customers say they are aware of the program and know how to use it:

- We're currently on the demand billing program.
- We are aware of the change.
- We know how to decipher and regulate it.

Respondents who said they were unaware of efforts in this area expressed a desire for more information and provided suggestions:

- I haven't heard about anything. In general, I'd like to hear more. If something saves money, then I would be interested.
- I'd like to know any ways we can save on steam.
- What is it, and how does it help us?
- We're always eager to hear any information. Right now we're using four steam chillers, so it's helpful to know.

- Make sure the numbers are right, but that's it.
- Use the Electric bill as an example.
- Another market to tap into is Co-ops. Billing is complex and many co-ops don't have professional managers. Would be good to have Con Edison to spell out how to save money on energy and have people that work with smaller co-ops.

Steam Cooling

Have you observed or heard about any efforts Con Edison has made to address issues related to steam cooling (including incentives and concerns about costs and reliability)?

42% Aware More than 40 percent of respondents reported they are aware of efforts in this area and could recall examples of what Con Edison did to address these issues. Thematic analyses of participant responses revealed the following themes presented below with illustrative comments:

Information is available on the website and through mailings, meetings, and other means:

- We've heard about the steam retention program, and dual-drive cooling program (using both electric and steam) when talking to Con Edison representatives.
- I read something in last month's notices. I know they're pushing it now, but I didn't read it thoroughly.
- I've only gotten information off the website. I would like to know how to reduce the bill.
- Our engineers talked with Con Edison about cooling with steam, but I'm not sure how far the discussion went.
- Con Edison does have information on this, but you have to seek it out. It comes into effect with steam cogeneration.

Some respondents mentioned incentives and rebates:

- I'm familiar with incentives utilized with the new cooling systems. They're supportive.
- They have given out rebates to encourage customers to use steam cooling.
- I know there are plans to offer a rebate for converting to steam cooling, but I haven't looked into it because of the type of equipment we use.

Participants noted that while they are aware of seminars and other educational opportunities more could be done:

- They offer seminars; but it's still more expensive than electric; it needs to be more comparable to make a difference.
- I get an occasional invitation to seminars but don't have time.
- I know they had a workshop, and someone sent me the presentation with links. But I haven't heard much about the competitiveness of steam cooling compared to cooling with other fuels. I'd like to know the economic issues involved with hybrid steam and when to fire the steam.

Respondents who are unaware of efforts in this area would like more information, particularly about efficiency and costs compared to electricity. Some said they don't deal with these issues and so they don't pay attention. Their verbatim comments are listed below:

- Would be interested in that (big on sustainability).
- Any information would be appreciated.
- Not steam cooling. Suggest maintaining temperature in building to conserve energy.
- Just in regards to efficiency: Inform customers on efficiency measures to drive costs down.
- Would like to see more cost comparisons to electricity.
- I'd like to see cost comparisons of heat absorption chillers with gas and electric. Without comparisons, any information is meaningless.
- I'd like to know about any programs that will substantially reduce the cost to customers in comparison with the cost of electricity.
- I don't pay attention to it.
- That information goes to the building office.

“Green” Building Assistance

Have you observed or heard about any efforts Con Edison has made to improve its assistance to customers in attaining “green” building status?

33% Aware

Only one-third of respondents are aware of efforts in this area. Thematic analyses of their comments revealed the following themes presented below with illustrative responses:

Respondents voiced their interest in going “green” and are aware of Con Edison’s efforts in this area:

- I know there are programs out there which show you which is the wiser choice: electric, steam, oil, etc.
- I think I read it on a bill.
- We did discuss it in general. We are looking to go “green” in the building.
- We’ve seen more and more engineers and architects going for LEED. The Hearst building got this kicked off and there’s a definite move in the “green” direction. Con Edison has helped.
- I have a letter here from them on management demand response.
- We work with NYSERDA, and our contact with NYSERDA is in Con Edison territory. I know NYSERDA has incentives that are higher for Con Edison. I imagine Con Edison has something to do with that.

Some customers expressed concerns about use of steam as an environmentally sound alternative and mentioned the associated challenges:

- We are interested in this. We reached out to Con Ed to get information to calculate our carbon footprint. But they couldn’t help us lower that impact. Although they indicated that they are exploring ways to do that, I didn’t hear too much about what those were.
- I’ve seen some, but I don’t know if it’s technically honest. There are strong differences of opinion on levels of emissions and the amount of carbon per unit of steam, and on the way that LEED ratings are evaluated. Con Edison has a strong view on that, and they aren’t particularly receptive to listening to other views. They’ve led people down a path where they thought they’d get LEED credit, but they didn’t get what they expected. I know some people who were pretty frustrated about that.
- Con Edison wrote a strong letter to Energy Star, copied to the US Green Building Council, about the fact that they’re penalizing customers who use steam, and asking that the penalty be changed.

Participants who are unaware of efforts in this area expressed their interest in protecting the environment and desire for more information. Their verbatim comments are presented below:

- It would be great if they sent pamphlets. Anything to improve the environment would be great.
- I'd like to hear about anything that will focus on energy savings and protect the environment.
- We are in the process of converting our building to "green," but I've heard nothing about how Con Edison can help. There's nothing in particular that I'd like to hear.
- I haven't heard anything but should. I have a completely "green" house and ride bicycle.
- I use oil in the building I'm in now, and just making the conversion from oil to steam would be a big step.
- If there are programs or information, I'd like them to be more accessible.
- Any information they send is good.
- Didn't know Con Edison had anything "green" going on. Would be interested in reading up on that.
- Need to move in that direction and have more renewable sources.
- They could offer education to end-users; develop new technologies; need a new way of thinking about these issues; but there's an inherent conflict of interests. Con Edison is in the business to sell energy vs. customers who are looking to save energy.
- Haven't observed it but things perking up with LEED stuff. Wish they were more aggressive with advertising "green."
- I'd like to know how they can help us. Can they get us a point on LEED charts? It would be helpful to know.

Distributed Generation

Have you observed or heard about any efforts Con Edison has made to address the potential for Combined Heat & Power systems (also known as distributed generation)?

30% Aware Less than one-third of participants said they are aware of Con Edison's efforts to address the potential for distributed generation. These respondents offer the following comments:

- They offer seminars.
- I have been invited to seminars and like the big push in this direction.
- I have only heard about micro-turbines. If there is anything else out there for combined heat and power, I'd be very interested to hear about it.
- I heard something about micro-turbines, but I haven't heard much about it.
- The lack of synchronous generation is holding Con Edison back in this area.
- I know they have incentive rebates.
- I would like to hear more about this on a local level.
- I'd love to hear about it, but I know they already have a program in place, and there are seminars you can go to.
- I'm familiar with steam towers. I would like to see a press release concerning CHP.
- I know they have programs available, but I haven't looked into them because of the type of equipment we use.

Thematic analysis of comments from participants who are unaware of efforts in this area identified the following themes presented below with illustrative comments:

Respondents said that more information is needed:

- I'd like to know what's available and how to save money. That's the bottom line.
- I'd like to see how distributed generation could take place. I'm also particularly interested in any programs that involve co-generation.
- Any information is good.
- I'd be interested in any combination systems being presented.

Con Edison needs to do more in this area, particularly by addressing costs:

- They need better systems and networks; they should try to rewrite rules.
- They haven't done a lot. Con Edison steam has been a bit obstructionist by their rates if someone wants to use co-generation.
- I've just heard about the NYSERDA programs. The NYSERDA outreach program accommodates Con Edison, and Con Edison is very expensive. Everybody's anxious about getting reduced costs. But one thing I don't like is information overload.

A number of respondents said they were not interested in this topic or did not deal with this area:

- I don't pay any mind to it. We only investigate services that we're thinking about changing. I would like to hear how efficient we can make steam for our cooling; what they would recommend.
- Our system provides both heat and A/C. If we modernize, we'd use an electric chiller to increase efficiency.
- It's a question for our Engineer.
- All information goes to the building office and gets disseminated to appropriate people.

Additional Comments

Is there anything else you would like to add?

When asked at the end of the interview whether they wanted to add anything else, participants reemphasized their satisfaction with Con Edison's service, desire for an ongoing relationship, direct contact, and follow-up. They also spoke of a need for more education opportunities and concerns about efficiency and costs:

- Everybody is helpful. We're working on a project at Lincoln Center and the crew is always there. I have nothing but good experiences with Con Edison.
- George Garrison is a great contact person.
- Build partnership with larger customers and have working relationship with them to get things done.
- If someone can come down and give me a general idea or cost analysis of what it would take to convert the building that I'm in now to steam, I would be very interested. I spoke with someone before, I don't remember who, but it never happened. The ball got dropped somewhere.
- Should not have automated responses but actual people should follow-up about service.
- Offer more education, e.g., seminars.
- Sheer economics. It is less efficient than other alternatives.