

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419

2 STATE OF NEW YORK

3 PUBLIC SERVICE COMMISSION

4 Case 23-E-0418 - Proceeding on Motion of the
5 Commission as to the Rates, Charges, Rules and
6 Regulations of Central Hudson Gas & Electric
7 Corporation for Electric Service.

8
9 Case 23-G-0419 - Proceeding on Motion of the
10 Commission as to the Rates, Charges, Rules and
11 Regulations of Central Hudson Gas & Electric
12 Corporation for Gas Service.

13 EVIDENTIARY HEARING

14 DATE: January 31, 2024

15 TIME: 9:34 a.m. to 4:52 p.m.

16 LOCATION: Empire State Plaza

17 Agency Building 3, 19th Floor

18 Albany, New York 12223

19 BEFORE: ALJ Ashley Moreno

20 ALJ James Costello

21
22
23 Reported by: Monique Hines
24
25

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419

2 APPEARANCES:

3 FOR THE NEW YORK STATE DEPARTMENT OF PUBLIC SERVICE:

4 BY: STEVEN J. KRAMER, ESQ.
5 JUSTIN FUNG, ESQ.
6 RYAN COYNES, ESQ.

7 Empire State Plaza, Agency Building 3
8 Albany, New York 12223

9 FOR CENTRAL HUDSON GAS & ELECTRIC DEPARTMENT

10 CULLEN & DYKMAN, LLP

11 BY: BRIAN FITZGERALD, ESQ.
12 GREGORY NICKSON, ESQ.

13 80 State Street, Suite 900
14 Albany, New York 12207

15
16 FOR PUBLIC UTILITY LAW PROJECT:

17 BY: LAURIE WHEELOCK, ESQ
18 THERESA A. HOTTE, ESQ.
19 ALICIA CORP-LANDIS, ESQ.
20 DANIEL RUSSELL, Legal Intern

21 194 Washington Avenue, Suite 320
22 Albany, New York 12210

23 FOR MULTIPLE INTERVENORS:

24 COUCH WHITE, L.L.P.

25 BY: JAY S. GOODMAN, ESQ.

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 540 Broadway
3 P.O. Box 22222
4 Albany, New York 12201
5

6 FOR WALMART:

7 SPILLMAN, THOMAS & BATTLE, P.L.L.C.
8 BY: STEVEN LEE, ESQ.
9 1100 Bent Creek Boulevard, Suite 101
10 Mechanicsburg, Pennsylvania 17050
11

12 FOR COMMUNITIES FOR LOCAL POWER:

13 BY: JESSICA MULLEN
14 SUSAN GILLESPIE
ROSEMARY DACRUZ

15 P.O. Box 3013
16 Kingston, New York 12446
17

18 FOR UTILITY INTERVENTION UNIT:

19 NEW YORK STATE DEPARTMENT OF STATE

20 BY: JOHN ROSWICK, ESQ.
21 123 William Street, 20th Floor
22 New York, New York 10038
23

24 NEW YORK STATE DEPARTMENT OF STATE

25 BY: ABIODUN RUFAI

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419

2 One Commerce Plaza

3 99 Washington Avenue, Suite 640

4 Albany, New York 12231

5
6 FOR THE TOWN OF OLIVE:

7 BY: SIMON STRAUSS

8 45 Indian Trail

9 Shokan, New York 12481

10
11 FOR DUTCHESS COUNTY:

12 BY: ALLEN PAGE

13 A. PAGE & ASSOCIATES, LLC

14 9 Vassar Street

15 Poughkeepsie, New York 12601

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1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419

2 I N D E X O F P R O C E E D I N G S

3 CENTRAL HUDSON'S CUSTOMER EXPERIENCE PANEL:

4 (Panel; TOM SU, JOSEPH HALLY, JEFFERY DOANE, ANTHONY
5 CAMPAGIORNI, LISA KOPP, CHERYL RYAN)

6 TOM SU, Sworn; 2981

7 JOSEPH HALLY, Sworn; 2981

8 JEFFERY DOANE, Sworn; 2981

9 ANTHONY CAMPAGIORNI, Sworn; 2981

10 LISA KOPP, Sworn; 2981

11 CHERYL RYAN, Sworn; 2982

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2 E X H I B I T I N D E X

3 Marked as

4 Described as

5 552 3122

6 IR-0301

7 553 3122

8 IR-308

9 554 3122

10 IR-353

11 555 3122

12 IR-369

13 556 3122

14 IR-583

15 557 3122

16 IR-618

17 558 3122

18 Public Version IR-739

19 559 3122

20 Confidential Version IR-739

21 560 3122

22 IR-741

23 561 3122

24 IR-771

25 562 3122

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2	IR-774	
3	563	3122
4	IR-785	
5	564	3166
6	PULP-7, IR-043	
7	565	3182
8	2023 Central Hudson Bill, 9 pages	
9	566	3182
10	Town of Olive (TOO) - 02-IR-006	
11	567	3201
12	Town of Olive (TOO) - IR-013	
13	568	3182
14	Town of Olive (TOO) - IR-014	
15	569	3182
16	Town of Olive (TOO) - IR-015	
17	570	3201
18	Town of Olive (TOO) - IR-010	
19	571	3202
20	2024 Central Hudson Bill, 2 pages	
21	572	3182
22	CLP-06, IR-032	
23	573	3235
24	CLP-06, IR-033	
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16	CLP-08, IR-055	
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18	CLP-08, IR-056	
19	583	3235
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23	585	3235
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1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419

2 (The hearing commenced at 9:34 a.m.)

3 A.L.J. COSTELLO: All right, we'll go
4 on the record.

5 A.L.J. MORENO: Okay.

6 A.L.J. COSTELLO: And we'll start with
7 appearances and we'll start with Central Hudson.

8 MR. FITZGERALD: Good morning, Your
9 Honors. On behalf of Central Hudson Gas & Electric
10 Corporation, the law firm of Cullen and Dykman, LLP,
11 by Brian FitzGerald, Greg Nickson, and Mike Lloyd.

12 MR. FUNG: DPS staff. Morning, Your
13 Honors. On behalf of DPS, Justin Fung, Stephen
14 Kramer, and Ryan Coyne.

15 A.L.J. COSTELLO: Good morning.
16 Communities for Local Partners -- Local Power, I'm
17 sorry.

18 MS. DaCRUZ: Good morning, Your
19 Honors. This is Rosemary DaCruz from Communities for
20 Local Power. We'll be joined shortly by Jess Mullen.

21 A.L.J. COSTELLO: Okay, thank you.
22 County of Dutchess.

23 MR. PAGE: Yes, Your Honor. This is
24 Allan Page for Dutchess County, and it is A. Page &
25 Associates.

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419

2 A.L.J. COSTELLO: Thank you. Good
3 morning. PULP.

4 MS. CORP: Good morning, Your Honors.
5 This is Alicia Corp on behalf of the Public Utility
6 Law Project, along with Laurie Wheelock, Dan Russell
7 and Theresa Hotte.

8 A.L.J. COSTELLO: Good morning. MI.

9 MR. GOODMAN: Good morning. Your
10 Honors from the law firm of Couch White. I'm Jay
11 Goodman, appearing on behalf of Multiple Intervenors.

12 A.L.J. COSTELLO: Good morning. UIU.

13 MR. ROSWICK: Good morning, Your
14 Honors. John Roswick and my colleague Abiodun Rufai
15 on behalf of Utility Intervention Unit.

16 A.L.J. COSTELLO: Good morning. And
17 do we have anyone here by -- from the Town of Olive?
18 Because I noticed that they had indicated that
19 they're going to be conducting cross. Anyone else
20 that I did not call? Walmart.

21 MR. LEE: Yes, Your Honor. Steven Lee
22 from the law firm of Spilman Thomas and Battle
23 appearing on behalf of Walmart.

24 A.L.J. COSTELLO: Okay. Thank you.
25 All right. With that, we'll begin with the testimony

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 of Central Hudson's Customer Experience Panel. And
3 may I ask you -- each to state your names and
4 business addresses for the record?

5 MR. SU: Tom Su, 284 South Ave,
6 Poughkeepsie, New York, 12601.

7 MR. HALLY: Joe Hally, 284 South Ave,
8 Poughkeepsie, New York, 12601.

9 MR. DOANE: Good morning. Jeff Doane,
10 284 South Avenue, Poughkeepsie, New York, 12601.

11 MR. CAMPAGIORNI: Anthony Campagiorni,
12 284 South Avenue, Poughkeepsie, New York, 12601.

13 MS. KOPP: Lisa Kopp, 284 South
14 Avenue, Poughkeepsie, New York, 12601.

15 MS. RYAN: Cheryl Ryan, 284 South
16 Avenue, Poughkeepsie, New York, 12601.

17 A.L.J. COSTELLO: Please stand and
18 raise your right hands. Do you swear or affirm that
19 the testimony you'll provide is the truth?

20 PANEL: I do, yes.

21 Tom Su; Sworn.

22 Joe Hally; Sworn.

23 Jeff Doane; Sworn.

24 Anthony Campagiorni; Sworn.

25 Lisa Kopp; Sworn.

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419

2 Cheryl Ryan; Sworn.

3 A.L.J. COSTELLO: Okay. Thank you.

4 You may be seated, counsel.

5 DIRECT EXAMINATION

6 BY MR. FITZGERALD:

7 Q. Thank you, Your Honor. Panel, do
8 you have in front of you a document entitled the
9 direct testimony of the customer experience panel
10 consisting of approximately 38 pages of questions and
11 answers, which was filed by the commission and with
12 the commission, I'm sorry, on July 31st, 2023?

13 A. (Panel) We do, yes.

14 Q. Was that document prepared by you
15 or under your supervision?

16 A. Yes.

17 Q. And do you have any changes or
18 corrections to that testimony?

19 A. No.

20 Q. And if I ask you the same
21 questions today, would your responses be the same?

22 A. Yes.

23 Q. And panel, do you adopt this as
24 your sworn testimony in this proceeding?

25 A. Yes.

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419

2 MR. FITZGERALD: Your Honor, I'd ask
3 that the direct testimony of the customer experience
4 panel consisting of 38 pages of questions and answers
5 be copied into the record as if given orally today.

6 A.L.J. COSTELLO: The motion is granted
7 and the initial testimony of Central Hudson's
8 Customer Experience Panel will be entered into the
9 record as if orally given here today.

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BEFORE THE
NEW YORK STATE
PUBLIC SERVICE COMMISSION

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Proceeding on Motion of the Commission as to the
Rates, Charges, Rules and Regulations of
Central Hudson Gas & Electric Corporation
for Electric Service

Case 23-E-_____

-----X

-----X

Proceeding on Motion of the Commission as to the
Rates, Charges, Rules and Regulations of
Central Hudson Gas & Electric Corporation
for Gas Service

Case 23-G-_____

-----X

**DIRECT TESTIMONY OF THE
CUSTOMER EXPERIENCE PANEL**

July 31, 2023

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DIRECT TESTIMONY OF THE CUSTOMER EXPERIENCE PANEL

I. INTRODUCTION

Q. Please state the names of the members of the Customer Experience Panel ("Panel").

A. Our names are Jeffery D. Doane, Brian J. Fuoco, Joseph J. Rocco, Michael R. Dooley, William A. Brandt, and Antonio X. Vazquez.

Q. Mr. Doane, please state your current employer and business address.

A. I am employed by Central Hudson Gas & Electric Corporation ("Central Hudson" or the "Company") and my business address is 284 South Avenue, Poughkeepsie, New York 12601.

Q. Mr. Doane, in what capacity are you employed by Central Hudson and what is your scope of responsibilities?

A. I am employed by Central Hudson as Manager of Customer Experience. In that capacity, I am responsible for customer operations including meter to cash field operations and customer-facing operations in our Contact Center. I also have oversight of Customer Billing and Digital Customer Experience and Analytics.

Q. Mr. Doane, what is your educational background and professional experience?

A. I received a Bachelor of Science degree in Mechanical Engineering from Clarkson University in 2006 and received my Master of Business Administration also from Clarkson University in 2007. I joined Central Hudson in 2007 and during that time, I have held positions in Engineering, Business Development, and Customer Service.

DIRECT TESTIMONY OF THE CUSTOMER EXPERIENCE PANEL

1 Q. Mr. Doane, have you previously testified before the New York State Public
2 Service Commission ("PSC" or the "Commission")?

3 A. No, I have not.

4 Q. Mr. Fuoco, please state your current employer and business address.

5 A. I am employed by Central Hudson and my business address is 284 South
6 Avenue, Poughkeepsie, New York 12601.

7 Q. Mr. Fuoco, in what capacity are you employed by Central Hudson and
8 what is your scope of responsibilities?

9 A. I am employed by Central Hudson as Senior Director of Customer
10 Contact. In that capacity, my responsibilities include managing the
11 Contact Center inclusive of Front and Back-office customer facing
12 operations.

13 Q. Mr. Fuoco, what is your educational background and professional
14 experience?

15 A. I received a Bachelor of Science degree in Business Management –
16 Economics from Niagara University in 1988 and received my Master of
17 Business Administration – Technology Management in 2003 from
18 University of Phoenix. I have been continuously employed by Central
19 Hudson since 1992 that in a variety of positions within the Customer
20 Service Group, Electric T&D, and Customer Account Services. My prior
21 responsibilities included Director Estimating & Real Property,
22 Superintendent Estimating Electric T&D, Supervisor New Business,

DIRECT TESTIMONY OF THE CUSTOMER EXPERIENCE PANEL

1 System Supervisor Meter Reading, and Project Manager Meter Reading
2 Optimization, Commercial Gas Marketing.

3 Q. Mr. Fuoco, have you previously testified before the Commission?

4 A. No, I have not.

5 Q. Mr. Rocco, please state your current employer and business address.

6 A. I am employed by Central Hudson and my business address is 284 South
7 Avenue, Poughkeepsie, New York 12601.

8 Q. Mr. Rocco, in what capacity are you employed by Central Hudson and
9 what is your scope of responsibilities?

10 A. I am employed by Central Hudson as Director, Credit and Collections. In
11 that capacity, my responsibilities include managing the Contact Center
12 collections operation and overseeing back-office customer support. I am
13 responsible for ensuring that Central Hudson's business policies and
14 procedures are in compliance with all Home Energy Fair Practices Act
15 ("HEFPA") regulations. It is also my responsibility to ensure that exception
16 work generated within our billing system is completed in a manner that
17 minimizes the impact to our customers.

18 Q. Mr. Rocco, what is your educational background and professional
19 experience?

20 A. I received a Bachelor of Science degree in Business Administration from
21 Marist College in 2017 and received my Master of Business Administration
22 from Syracuse University in 2022. Since 2014, I have been continuously
23 employed by Central Hudson in various positions within Customer

DIRECT TESTIMONY OF THE CUSTOMER EXPERIENCE PANEL

1 Account Services. My prior responsibilities included Customer Account
2 Services Supervisor and Service Supervisor. Prior to my employment with
3 Central Hudson, I had more than ten years of Contact Center
4 management experience.

5 Q. Mr. Rocco, have you previously testified before the Commission?

6 A. Yes. I have testified before the Commission in Cases 20-E-0428 and 20-
7 G-0429.

8 Q. Mr. Dooley, please state your current employer and business address.

9 A. I am employed by Central Hudson and my business address is 284 South
10 Avenue, Poughkeepsie, New York 12601.

11 Q. Mr. Dooley, in what capacity are you employed by Central Hudson and
12 what is your scope of responsibilities?

13 A. I am employed by Central Hudson as Senior Director of Customer Billing.
14 In that capacity, I am responsible for oversight of the customer billing
15 team. This team is tasked with billing exception management, responding
16 to customer inquiries related to billing, and testing system changes related
17 to billing.

18 Q. Mr. Dooley, what is your educational background and professional
19 experience?

20 A. I received a Bachelor of Science degree in Business from Marist College
21 in 2008 and received my Master of Business Administration also from
22 Marist College in 2014. I started with Central Hudson in 2011 and joined
23 the Customer Billing team in August 2022. During my time with Central

DIRECT TESTIMONY OF THE CUSTOMER EXPERIENCE PANEL

1 Hudson, I have held positions in Treasury, Business Development, Fleet,
2 Supply Chain and Customer Service. Prior to joining Central Hudson, I
3 held positions in Finance and Construction Management.

4 Q. Mr. Dooley, have you previously testified before the Commission?

5 A. No, I have not.

6 Q. Mr. Brandt, please state your current employer and business address.

7 A. I am employed by Central Hudson and my business address is 284 South
8 Avenue, Poughkeepsie, New York 12601.

9 Q. Mr. Brandt, in what capacity are you employed by Central Hudson and
10 what is your scope of responsibilities?

11 A. I am employed by Central Hudson as Senior Director of Customer Field
12 Services. In that capacity, my responsibilities include managing Customer
13 Field Services which includes the Commercial Department, Meter Reading
14 Department, and Customer Field Services Contractor Operations. I
15 provide oversight daily to a combined force of approximately 100
16 Company employees and contractors. I am responsible for ensuring all
17 customer requested service work at their homes and businesses is
18 completed safely, professionally, and efficiently. This includes items such
19 as Gas and Electric Emergency Response, Scheduled Customer
20 Appointments, Service orders, Dispatch orders, New Business Requests,
21 and System Maintenance repairs and inspections as required as well as
22 many other field operations. I am also responsible for the Meter Reading
23 System Operations which include management of Meter Reading

DIRECT TESTIMONY OF THE CUSTOMER EXPERIENCE PANEL

1 Supervision and Field Supervisors and Contractor Meter Reading
2 oversight. Also, I am responsible for Contractor Meter Mechanics who
3 work our Distribution Improvement projects and New York State-required
4 Indoor Corrosion and Leak Survey Corrosion Inspectors.

5 Q. Mr. Brandt, what is your educational background and professional
6 experience?

7 A. I received an Associate degree in Business Administration in 1987 from
8 Columbia-Greene Community College and a Bachelor of Science degree
9 in Business Economics from Oneonta State University in 1990. I have
10 been continuously employed by Central Hudson and CH Energy Group in
11 many positions over the past 30 years. My prior positions include multiple
12 Power Plant Operation positions, Gas Capital Construction Mechanic,
13 Energy Marketing Specialist, Energy Account Executive (Central Hudson
14 Enterprises-CH Energy Group), Service Supervisor, New Business
15 Counselor, Estimating Supervisor, Operating Supervisor-Commercial
16 Dept., and Director- Commercial and Contractor Operations. Prior to my
17 employment with Central Hudson, I worked for Osmose Utilities, GTE, and
18 Matrix Communications in various Technician, Foreman roles. I have also
19 served in various Committee Chairmanship positions for the AGA
20 (American Gas Association) and NGA (Northeast Gas Association) over
21 my career, as well as the NGA/PSC Advisory Committee, NYPERI, and
22 multiple NGA SME Committees over my career.

DIRECT TESTIMONY OF THE CUSTOMER EXPERIENCE PANEL

1 Q. Mr. Brandt, have you previously testified before the Commission?

2 A. Yes. I have testified before this Commission in Cases 20-E-0428 and 20-
3 G-0429.

4 Q. Mr. Vazquez, please state your current employer and business address.

5 A. I am employed by Central Hudson and my business address is 284 South
6 Avenue, Poughkeepsie, New York 12601.

7 Q. Mr. Vazquez, in what capacity are you employed by Central Hudson and
8 what is your scope of responsibilities?

9 A. I am employed by Central Hudson as Director of Digital Experience. In
10 that capacity, my responsibilities include customer experience
11 improvements to the website, mobile app and chatbot.

12 Q. Mr. Vazquez, what is your educational background and professional
13 experience?

14 A. I received a Bachelor of Science degree in Business Economics from
15 Oneonta State University in 1993. I started with Central Hudson in 2019.
16 Prior to joining Central Hudson, I held various operational and testing
17 positions in the Banking and Healthcare industries.

18 Q. Mr. Vazquez, have you previously testified before the Commission?

19 A. No, I have not.

20 **II. PURPOSE OF TESTIMONY**

21 Q. What is the purpose of the Panel's testimony in these proceedings?

22 A. The purpose of this testimony is to: 1) discuss the SAP Customer
23 Information System ("CIS") transition and the Company's performance

DIRECT TESTIMONY OF THE CUSTOMER EXPERIENCE PANEL

1 relative to its customer service performance indicators ("CSPIs"); 2)
2 discuss the Company's initiatives to enhance customer service including a
3 transition to monthly meter reading, technology investments that improve
4 communication and interactions with customers while providing more self-
5 service options and increasing the ease of use for key existing self-service
6 options, consumer outreach improvements to our most vulnerable
7 customers, and improvements to the benchmarking of customer service
8 through JD Power; 3) discuss the Company's proposed changes to the
9 Residential Customer Satisfaction Survey and the PSC Complaint rate in
10 order to more accurately and appropriately measure customer sentiment
11 and better align the Company's metrics with statewide methodologies; 4)
12 discuss the need for additional resources to bolster the Company's efforts
13 to manage the aftermath of the COVID pandemic and the resulting record
14 amount of customer arrears; and 5) discuss the continuation of the
15 deferral of debit and credit card fees in order to provide certainty around
16 customers' ability to continue utilizing these payment methods.

17 Q. Is the Panel sponsoring any exhibits in support of its testimony?

18 A. Yes. This Panel is sponsoring the following exhibits that were prepared by
19 or under the direction of the Panel or one of its members:

20 Exhibit __ (CEP-1) contains the System Performance and Customer
21 Service Dashboard;

22 Exhibit __ (CEP-2) contains details related to the Digital Customer
23 Experience ("DCX") Portfolio;

DIRECT TESTIMONY OF THE CUSTOMER EXPERIENCE PANEL

Exhibit __ (CEP-3) contains the proposed targets and associated revenue adjustments for the Residential Customer Satisfaction Survey to serve as the basis for the Customer Satisfaction Index calculation; and

Exhibit __ (CEP-4) contains the impact of collections efforts on the Customer Experience headcount forecast for the period of 2023–2028.

III. SAP TRANSITION AND CUSTOMER SERVICE PERFORMANCE

Q. Please discuss the SAP CIS transition.

A. On September 1, 2021, Central Hudson launched its new SAP-based CIS. Immediately after the launch, there were issues with its new SAP CIS that resulted in impacts to a portion of Central Hudson's customers, including through delayed and inaccurate invoices, confusion, and anxiety. Despite Central Hudson's best efforts to correct the issues, the issues continued, and Central Hudson experienced a rise in customer complaint levels, harsh criticism from politicians, and questions from the Commission and others seeking to understand the problems with the SAP CIS. Central Hudson redoubled its efforts with the help of its union and management employees, third-party experts, and contractors to correct all issues.

Q. Has Central Hudson tracked the impact to service levels associated with the launch of SAP CIS and associated events?

A. Yes, the Company developed a dashboard which outlines Central Hudson's progress along six key metrics. These metrics are % Current Bills, % Bills Requiring Adjustments, Actual Bills Replaced with Estimates,

DIRECT TESTIMONY OF THE CUSTOMER EXPERIENCE PANEL

1 Call Service Level, % of Calls Abandoned, and Average Wait Time. As of
2 the date of this filing, the most recent version of this dashboard dated July
3 20, 2023, has been included as Exhibit __ (CEP-1).

4 Q. Has performance associated with these metrics returned to pre-SAP CIS
5 launch levels?

6 A. All of the metrics are close to, at, or above performance levels associated
7 with the period prior to the SAP CIS launch. Additionally, significant
8 improvement can be seen in all of the metrics relative to the peak of the
9 SAP CIS issues.

10 Q. Please summarize the performance increases associated with the metrics
11 listed in Exhibit __ (CEP-1).

12 A. First it is important to note that progress towards resolving the SAP CIS
13 issues was significantly impacted by the Columbia Utilities default with the
14 New York Independent System Operator, which generated an unexpected
15 billing impact to over 25,000 customers. This can be seen in each key
16 performance indicator ("KPI") from July through September of 2022.

- 17 • % Of Current Bills has stabilized on or around 98%, from a low point of
18 90% in September of 2022.
- 19 • % Bills Requiring Adjustments is near 3% and has shown significant
20 improvement from its peak of approximately 10%.
- 21 • Actual Bills Replaced with Estimates has improved from a peak of
22 approximately 16% in December of 2022 to a level of 3%.

DIRECT TESTIMONY OF THE CUSTOMER EXPERIENCE PANEL

- 1 • Call Service Level (percent of calls answered by a representative
2 within 30 seconds), which is an existing CSPI, is approximately 75%,
3 which is above the target established in the Commission's Order
4 Adopting Terms of Joint Proposal and Establishing Electric and Gas
5 Rate Plan issued on November 18, 2021 in Cases 20-E-0428 and 20-
6 G-0429 ("2021 Rate Plan").
- 7 • % Of Calls Abandoned is slightly below the historic level of 7%
8 associated with the Average Wait time of approximately three minutes.

9 It is important to note that the number of customer contacts and confusion
10 have also been exacerbated by significant increases in commodity costs.

11 During this time, both electric and natural gas commodity prices have
12 increased by over 100%.

13 Q. Does the Company expect to be at or above baseline (period prior to the
14 SAP CIS launch) performance levels for these metrics prior to July 1,
15 2024?

16 A. Yes, the Company is working on all outstanding issues and expects to
17 return to or exceed baseline performance levels for each of these metrics.

18 Q. Have any other metrics been impacted by the SAP CIS launch?

19 A. Yes, issues with the SAP CIS launch have also impacted the performance
20 of the Company's CSPIs, which were established in the 2021 Rate Plan.

21 Q. Please list the Company's CSPIs.

22 A. The CSPIs consist of the following measures: (1) PSC Complaint Rate; (2)
23 Residential Customer Satisfaction Survey; (3) Percent of Calls Answered

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1 by a Representative within 30 Seconds; and (4) Appointments Kept. The
2 Residential Service Terminations/Uncollectible Target metric was paused
3 for the term of the rate plan. All metrics are measured on a calendar year
4 basis.

5 Q. To date, has the Company met all the CSPI targets established in the
6 2021 Rate Plan?

7 A. No, Central Hudson has not met all of its CSPI targets and as a result has
8 incurred negative revenue adjustments. The Company has met the
9 Percent of Call Answered by a Representative within 30 seconds with
10 67.84% in 2021 and 72.55% in 2022. The Company met the target of
11 PSC Complaint rate in 2021 with 0.92 but failed to meet the target in 2022
12 with a value of 11.34 complaints per 100,000 customers. The Company
13 did not achieve the target for the Residential Customer Satisfaction
14 Survey in either 2021 or 2022 with results of 85% and 66.7%, respectively.
15 There is no target associated with Appointments kept, but the Company in
16 both 2021 and 2022 kept over 99% of scheduled appointments in each
17 year. Of the few appointments missed, those customers were credited
18 \$20 as required.

IV. CUSTOMER SERVICE IMPROVEMENT AND ENHANCEMENTS

20 Q. Is Central Hudson proposing any changes that will improve or enhance
21 Customer Experience?

22 A. Central Hudson is proposing four initiatives to enhance and improve
23 customer experience. These initiatives include: 1) a transition to monthly

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meter reading; 2) technology investments that improve communication and interactions with customers while increasing the number and ease of use of self-service options; 3) bolstering consumer outreach to our most vulnerable customers; and 4) utilizing JD Power to improve the benchmarking of customer service in order to measure Central Hudson's performance directly against other utilities and provide a basis for establishing performance improvement goals.

A. IMPLEMENTATION OF MONTHLY METER READING

Q. Please briefly describe the Company's proposed transition to monthly meter reading from the present bi-monthly structure.

A. Central Hudson has evaluated and developed a plan to adjust its billing practices and to conduct monthly meter reads, thereby eliminating alternate month bill estimates. This plan was filed on January 17, 2023, in Case 22-M-0645 and fully lays out the timeline and the incremental costs and resources required for the transition. On July 27, 2023, DPS Staff and the Company reached an interim agreement which prescribes an acceleration of the originally proposed timeline. The transition to monthly meter reading is aligned with residential customer sentiments that show a preference for monthly meter reads and dissatisfaction with bi-monthly billing estimates. Due to the timing of the interim agreement, this item is subject to update as stated in the testimony of the Revenue Requirements Panel.

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1 Q. Why does the Monthly Meter Reading Plan propose a phased roll out?

2 A. A phased roll out of monthly meter reading is designed to protect
3 customers by limiting any programming defects discovered within the “real
4 world environment” to the smallest group of customers possible. The
5 intent of the phased roll-out would be to first implement the program for a
6 very specific subset of customers, then to expand the program to an initial
7 meter reading route, and next to each of the Company’s five districts, until
8 full scale implementation is achieved.

9 Q. Please describe the incremental annual costs and resources required to
10 implement monthly meter reading.

11 A. The incremental annual costs equate to approximately \$4.4 million. These
12 incremental costs are comprised of recurring and one-time operating and
13 maintenance (“O&M”) costs as well the return on and of approximately
14 \$1.8 million of capital expenditures.

15 • Annual O&M costs related to the transition to monthly meter reading
16 will be approximately \$4.0 million. The majority of this cost is
17 attributable to additional meter reading resources, with the small
18 remainder driven by maintenance costs of meter reading hardware
19 and maintenance and fuel costs for meter reading vehicles. Meter
20 reading resources are assumed to be fulfilled by both external

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1 contractors and internal labor. Based on the timeline noted above,
2 these resources will be hired subsequent to the Rate Year.

- 3 • Capital Expenditures related to the transition to monthly meter reading
4 are estimated to be approximately \$1.8 million, largely driven by
5 vehicle purchases and technology investments such as meter reader
6 equipment, mobile radios, tough-pad tablets, and programming
7 modifications in the SAP CIS system. These costs are included within
8 the Company's capital forecast. Additionally, costs associated with
9 the return on and of associated capital investments are estimated to
10 be approximately \$0.4 million.

- 11 • In addition to the recurring costs noted above, one-time O&M expense
12 associated with a customer outreach campaign is estimated to cost
13 \$0.2 million.

14 Q. Does the Company have anything else to add regarding the transition to
15 monthly meter reading?

16 A. Given the timing of the interim agreement, the full costs associated with
17 the revised monthly meter reading plan included in the interim agreement
18 are not reflected in the Rate Year revenue requirements. As such, the
19 Company proposes that revenue requirements be updated at a later stage
20 in this proceeding for all impacted components of revenue requirements
21 pertaining to the monthly meter reading plan.

DIRECT TESTIMONY OF THE CUSTOMER EXPERIENCE PANEL**B. IMPROVEMENT OF CUSTOMER EXPERIENCE TECHNOLOGY**

Q. Please describe the Company's technology investments that will improve communications and interactions with customers while providing more self-service options and increasing the ease of use for key existing self-service options.

A. The Company seeks to implement a portfolio of projects in the Rate Year ending June 30, 2025, requiring \$5.3 million in capital expenditures.

These projects are also reflected in Exhibit __ (CEP-2) and discussed in testimony of the Technology Capital and Operations Panel. The portfolio contains the following projects: 1) Interactive Voice Response ("IVR") Modernization, 2) Customer Web and Mobile Technology Improvements including a dedicated experience for commercial customers, and 3) a centralized notification system.

Q. What are the current limitations and challenges of the Company's current IVR system that require modernization?

A. A major limitation of the current IVR system is the ability to integrate with other channels. Many customers interact with the Company via a mobile phone to call, visit the website, or navigate the mobile application.

However, the current IVR system was designed prior to increased customer demand for that customer journey and does not include integration with web or application-based service offerings. Additionally, the current IVR solution is limited in its ability to easily make efficiency changes to the routing and handling of calls during high-volume or storm

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1 situations. Finally, the Company needs the ability to make changes
2 without relying on a vendor, which creates long lead-times, as is done
3 today.

4 Q. Please describe the Company's investment in IVR modernization.

5 A. Central Hudson will invest approximately \$1.7 million within the Rate Year
6 and \$3 million by the end of 2025 to replace the current on-premises IVR
7 system with a cloud-based IVR solution that will enable features such as
8 Voice Recognition, and VoiceBots that will augment contact center live
9 agent support by providing self-service voice capabilities for customers.
10 Additionally, features such as Visual IVR and predictive call routing will be
11 implemented, to match the call with the optimal Contact Center agents
12 that have been provided additional information and analytics on the
13 customer call. Finally, the new IVR will allow customers on digital
14 platforms to seamlessly transition between channels.

15 Q. What enhancements to Customer Web and Mobile Technology is the
16 Company proposing?

17 A. Central Hudson is proposing approximately \$3.6 million during the Rate
18 Year to enhance its customer-facing Web and Mobile Technology
19 interfaces. First, the Company will be evaluating all customer-facing
20 digital channels for alignment with the Americans with Disabilities Act
21 standards. This evaluation will identify gaps to allow future enhancements
22 to be in alignment with standards for customers with disabilities. Second,
23 the Company will be redesigning the MyAccount page on its website as

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1 well as the mobile application. Approximately 60% of customers have an
2 active online account with Central Hudson. Efforts are being made to
3 capture additional customers through various outreach channels. These
4 customers access their accounts via their MyAccount page for information
5 about their bills, make payments, and enroll in a variety of programs.
6 Concurrently with bill design efforts, the MyAccount page will become
7 easier to use as customers will utilize a more familiar and modern
8 appearance with easy-to-understand information. In addition to this effort,
9 push notifications will be implemented through the mobile application.
10 Customer response rates to communication via a mobile phone, for
11 example through SMS texting, have proven to be an extremely effective
12 tool. Finally, the Company will implement new website features, like
13 "streetlight out" reporting and additional energy calculators.

C. ENERGY AFFORDABILITY PROGRAM

15 Q. How many customers were enrolled in the Company's Energy Affordability
16 Program ("EAP") as of March 2023?

17 A. As of March 2023, 19,854 customers were enrolled in the EAP.

18 Q. Does the Company expect enrollment in the EAP to continue to grow?

19 A. Yes. As further explained below, the Company expects enrollment to
20 continue to grow and the Company's Forecasting and Rates Panel
21 projected future participation for purposes of setting the discounts.

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1 Q. How does the Company intend to continue their EAP enrollment growth?

2 A. Central Hudson will continue to provide recommendations about the data
3 fields that need to be captured on the Home Energy Assistance Program
4 ("HEAP") application which can be used during the Office of Temporary
5 Disability Assistance file share with all utilities. In addition, Central
6 Hudson will continue its Outreach and Education efforts to notify eligible
7 customers of the EAP and how to qualify for benefits.

8 Q. Based on actual and forecasted participation, will the Company have an
9 under collection for the EAP under the 2021 Rate Plan?

10 A. Yes, the Company anticipates having a regulatory asset for both electric
11 and gas for this program at June 30, 2024. The August 12, 2021 Order
12 Adopting Energy Affordability Policy Modifications and Directing Utility
13 Filings ("EAP Order") in Case 14-M-0565, established new bill discounts
14 that, based on timing, were not incorporated into the revenue
15 requirements established in Cases 20-E-0428 and 20-G-0429 thereby
16 resulting in an under collection of EAP expense.

17 Q. What is the Company's projected cost for the EAP in the Rate Year?

18 A. The August 2021 EAP Order requires an annual review of monthly bill
19 discounts to ensure that the discounts keep customer's monthly energy
20 burden at 6% or less of their average annual household income, while at
21 the same time limiting the total program cost to 2% of annual revenues for
22 gas and electric. As further discussed in the testimonies of the
23 Forecasting and Rates and Revenue Requirements Panels, based on

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1 review of annual revenues and the quantification of the expected 6%
2 energy burden in accordance with the EAP Order's prescribed
3 methodology, as well as the proposed updates to the monthly low income
4 bill discounts, is the Company anticipates that these programs will reach
5 the 2% cap for total program cost in the Rate Year. Reaching the cap
6 equates to a program budget and rate allowance of \$20.2 million for
7 electric and \$5.3 million for gas.

8 Q. Is the Company proposing any changes to the symmetrical deferral
9 mechanism for either component of the Company's EAP?

10 A. No.

11 D. **TARGETED CUSTOMER OUTREACH**

12 Q. What other actions is the Company taking to improve their Outreach and
13 Education in the community?

14 A. The Consumer Outreach organization is increasing the number of
15 representatives to have more visibility in the communities we service with
16 a goal to meet customers where they are more comfortable. The
17 increased staffing will enable the organization and the Company to
18 strengthen its engagement with customers. It will also increase the
19 Company's presence and education regarding the programs and payment
20 assistance opportunities available to customers at county/state agency
21 offices, libraries, senior housing communities and other community
22 events.

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1 Q. Please describe the role of Central Hudson's Consumer Outreach
2 organization.

3 A. Central Hudson's Consumer Outreach organization has a few key
4 functions, including:

- 5 • Conducting community outreach with an emphasis on low income and
6 disadvantaged populations. This outreach includes sharing
7 information about NY State and Central Hudson's programs for low-
8 income customers, seniors, veterans, elderly, blind, disabled, and
9 other.
- 10 • Maintaining compliance with HEFPA.
- 11 • Responding to customers who file complaints with the Commission.
12 This includes analyzing and investigating complaints, responding to the
13 customer, and tracking and closing the complaints in the PSC Portal.
- 14 • Responding to customers whose complaints arrive via other channels,
15 including state elected officials (Attorney General, state legislative),
16 county executives, members of Congress, and others.
- 17 • Compiling accurate and complete filing data and credits relative to NY
18 State and Central Hudson low income programs, such as HEAP, the
19 Good Neighbor Fund, and any other emergency measures that may be
20 developed such as the Arrears Management Program or Emergency
21 Rental Assistance Program.

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1 Q. How many employees currently exist within the Consumer Outreach
2 organization?

3 A. For much of 2022, Consumer Outreach fluctuated between three to five
4 members. This included between two to four Consumer Outreach
5 Representatives and a Consumer Outreach Director. Due to an inability to
6 keep pace with the increased rate of incoming PSC complaints, beginning
7 in July 2022, the organization was supplemented by Central Hudson
8 employees from other departments. Also beginning in July, the
9 organization was supplemented by contract resources to assist with
10 analysis associated with PSC complaints. In 2023, a decision was made
11 to increase the employee headcount within the organization so that PSC
12 complaints could be handled in a more sustainable manner and so that
13 the Company could more effectively engage with and assist employees in
14 the community at events and meetings. The organization added three
15 additional Consumer Outreach Representatives, bringing its total
16 population of employees to seven. By July 1, 2024 five additional
17 employees will be hired including three additional Consumer Outreach
18 Representatives, one Consumer Outreach Director, and one Consumer
19 Outreach Supervisor. The Consumer Outreach department will continue
20 to rely in part on contract support to fulfill its mission, including using those
21 resources to assist with investigating and closing PSC and elected official
22 complaints.

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- 1 Q. Why is Central Hudson adding positions to this organization?
- 2 A. PSC Complaints received by Central Hudson remain elevated with no
3 expectation that they will significantly diminish. Complaints from all
4 channels, including from elected officials, the Public Utility Law Project,
5 and the Better Business Bureau, continue to arrive at elevated levels
6 compared to historic norms. Historically, Central Hudson would receive a
7 few hundred complaints each year. In 2022, the Company received more
8 than 3,000 complaints. The Company is on track for a similar total in
9 2023. In addition to PSC Complaints, the Company receives around an
10 additional 75 to 150 complaints each month from elected officials and
11 other channels. On average it takes approximately 2.5 hours to handle
12 each complaint including time to review, process, analyze, communicate
13 with the customer, and close the complaint. The increase in Consumer
14 Outreach staff and their work is aimed not only at resolving PSC
15 complaints, but also at conducting important outreach activities in the
16 communities we serve in order to answer questions before they become
17 complaints. The organization ramped up outreach this year to visit senior
18 centers, conduct open house events, partner with elected officials to meet
19 directly with customers, attend community events to meet customers in
20 disadvantaged communities and more. Consumer Outreach also plays a
21 key role in assisting customers who have greater challenges. This
22 includes work to manage or assist with the Company's EAP, enrolling
23 customers in Deferred Payment Agreements ("DPAs"), facilitating the

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1 donations of gift certificates, administering the Company's Good Neighbor
2 Fund, managing the Company's HEAP program and Life Support
3 Equipment program, and assisting our elderly, blind and disabled
4 customers, among other helpful activities.

5 Q. Why is it important to bolster customer assistance activities, outreach and
6 participating in community events?

7 A. As Central Hudson resumes collection activities it will be important to
8 guide customers that require assistance to resources such as HEAP, the
9 EAP, and the Good Neighbor fund. To increase the number of eligible
10 customers that are aware of these programs, the Company will need to
11 participate in community events, increase its presence at Social Service
12 agencies, hold open houses, and find other ways to communicate with
13 and assist customers.

14 E. **J.D. POWER BENCHMARKING STRATEGY**

15 Q. Did the Management Audit conducted in Case 21-M-0541 include a
16 recommendation related to benchmarking of customer service operations?

17 A. Yes. The Management Audit included Recommendation 8.1, which
18 recommends that the Company implement performance benchmarking for
19 customer service operations in the Contact Center, Meter Reading,
20 Customer Field Services and for customer satisfaction, using JD Power or
21 another benchmarking data source.

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1 Q. What investments in benchmarking is the Company proposing?

2 A. The Company's Management Audit Implementation Plan responded to
3 recommendation 8.1 with a plan to partner with J.D. Power to participate
4 in a subset of the following offerings: Electric Residential Study, Electric
5 Business Study, Utility Digital Study, and a Customer Service Excellence
6 Study. The Company investment to participate in these studies is
7 approximately \$164,000 during the Rate Year.

8 Q. Why does the Company believe this benchmarking is necessary to
9 improve the customer experience?

10 A. Benchmarking will allow Central Hudson to measure its performance
11 directly against other utilities and provide a basis for establishing
12 performance improvement goals.

13 Q. What information will be provided through these studies?

14 A. The Electric Residential and Electric Business studies provide similar
15 information relating to each of the respective customer sectors. The
16 Company will have access to competitive industry data that provides a
17 comparison between utility peers, the industry, and the highest performers
18 across six key factors at both the national and regional levels. These
19 factors are Power Quality & Reliability, Customer Care, Price,
20 Communications, Billing & Payment, and Corporate Citizenship. Special
21 Survey categories include Net Promoter Score, Move-In/Transfer Service,
22 Brand Strength, Products & Services, and Electric Vehicles.

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1 Q. What does the Utility Digital Study provide?

2 A. This study evaluates digital channels across the Company and how
3 customers interact with them. Customers are asked to rate the usage for
4 tools like setting up an online account, account log in, making a payment,
5 viewing consumption history, report outages, among others. The
6 information provided from customers will give insight into ease of
7 navigation, appearance, clarity of the information, speed of loading pages,
8 and range of services.

9 Q. What is the Customer Service Excellence Study?

10 A. This is a benchmarking study to understand how the Company compares
11 to peers in delivering best in class customer service. This includes access
12 to best practices, customer experience and operational data, identification
13 of performance gaps, and expert guidance on improvements.

14 **V. CSPI MEASUREMENT AND ALIGNMENT**

15 Q. Is Central Hudson proposing any changes to its current CSPIs?

16 A. Yes, the Company is proposing to adjust (1) the calculation of the PSC
17 Complaint Rate; and (2) the survey method and calculation of the
18 Residential Customer Satisfaction Survey Metric. The Company is not
19 proposing any changes to the Percent of Calls Answered by a
20 Representative within 30 Seconds or the Appointments Kept metric or
21 targets. Proposed targets and associated revenue adjustments for the
22 Residential Customer Satisfaction Survey Metric are shown in Exhibit ____
23 (CEP-3).

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1 Q. What changes is the Company proposing associated with the PSC
2 Complaint Rate?

3 A. The Company proposes excluding the complaints associated with
4 commodity prices that are outside of the Company's control.

5 Q. Why does the Company believe this exclusion is appropriate?

6 A. Complaints around this topic are outside of the Company's control.
7 Therefore, complaints resulting from the price of electric and/or gas
8 energy and/or capacity or the operation of the Company's Energy Cost
9 Adjustment Mechanism ("ECAM") and/or Gas Supply Charge ("GSC") do
10 not present a just cause for charging a complaint against the Company
11 and do not show or point to any deficiency in the Company's service to
12 customers. Additionally, this exclusion would increase alignment across
13 the state, as this exclusion was included in Con Edison's Joint Proposal
14 recently approved by the Commission.

15 Q. Is the Company proposing a change to the target associated with the PSC
16 Complaint Rate metric?

17 A. No, the Company believes that, with the proposed adjustment to the
18 calculation of the metric, no change to the target is needed at this time.

19 Q. Please describe the changes the Company is proposing associated with
20 the Residential Customer Satisfaction Survey.

21 A. Central Hudson proposes to replace the Residential Customer Satisfaction
22 Survey instrument with the statewide customer satisfaction survey
23 designed by the utilities and DPS Staff and implemented on a pilot basis

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per the October 18, 2018, Order in Case 15-M-0566 (“Survey Order”).

The Customer Satisfaction Index will be calculated from one question, with a five-point scale for customer satisfaction. The question is “Thinking about your most recent transaction with Central Hudson, how satisfied are you?” The responses are scored as follows: (1) Very Dissatisfied, (2), Dissatisfied, (3) Neither Satisfied or Dissatisfied, (4) Satisfied, (5) Very Satisfied. Finally, Central Hudson proposes that the Residential Customer Satisfaction Survey metric be split into two survey groups (High Priority interactions and General Account & Billing interactions). These changes will more accurately and appropriately measure customer sentiment and better align the Company’s metrics with statewide methodologies.

Q. Please describe why the statewide survey is more appropriate than the current Residential Customer Satisfaction Survey.

A. The statewide survey method is a better representation of customer satisfaction than the current survey for the following reasons: 1) the survey was designed to align with current customer preferences to encourage participation through ease of use instead of filling out a cumbersome paper-based survey; 2) the survey will include customers who interact with the Company through multiple channels including phone, text, web & mobile app self-service channels, and also field visits; 3) the survey is a consistent measurement that all New York State Utilities utilize and was recommended for permanent use by the DPS.

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1 Q. Has Central Hudson implemented this survey and, if so, how much data
2 has the Company collected via this survey over time?

3 A. Yes. Consistent with the Survey Order, Central Hudson has administered
4 the survey through email since January 2019. The responses from the
5 survey have been reported within the monthly Performance Indicator
6 Report ("PIR") on a quarterly basis in Case 15-M-0566.

7 Q. Will Central Hudson include survey channels other than e-mail?

8 A. Yes, although Central Hudson has e-mail addresses for approximately
9 60% of its residential customers it is important to include the sentiments of
10 customers that prefer other communication channels. The Company
11 proposes that the survey will include multiple channels including phone,
12 text, web & mobile app self-service channels, and also field visits.
13 Additionally, phone interactions may result in a post call phone survey, an
14 email survey, or a text survey. A simple average weighting of the survey
15 responses gathered through these channels will be utilized.

16 Q. Are there any other changes to the residential customer survey?

17 A. Yes, the Company is proposing to sort all interactions into two categories:
18 1) High Priority and 2) General Accounts and Billing.

19 Q. Please discuss why the Residential Customer Satisfaction Survey should
20 be split into two metrics consisting of High Priority interactions and
21 General Account & Billing interactions.

22 A. High Priority interactions and General Account & Billing interactions
23 address very different customer issues and resolution expectations.

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1 Satisfaction to the Company's response to these issues should be
2 measured separately and distinctly in order to allow accurate and precise
3 tracking of these issues and the respective customer satisfaction level with
4 the Company's response.

5 Q. Please describe how High Priority interactions will be categorized.

6 A. High Priority Interactions, which include interactions that are safety and
7 reliability related, will be defined as follows: Gas Odor calls, Electrical
8 Emergency reports, Customer reported Outages, and Reports of
9 streetlights out.

10 Q. Please describe how General Account & Billing interactions will be
11 categorized.

12 A. General Account & Billing interactions will be defined as follows:
13 Payments made, Budget Billing plan changes, ESCOs changes,
14 Notifications Preference changes, Installment Plans created, Energy
15 Efficiency program enrollments, Customer contact info updates, Meter
16 Read submissions, Start or Transfer of Service, Bill cancellations,
17 NYSERDA OBF, Energy Affordability Program Credit, HEAP commitment,
18 Debits/Credits, ERT Opt Out, Permit/Pressure Test, Meter changes, Rate
19 changes, Field Visits and Service Orders.

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1 Q. Has this type of proposal separating these two issues into separate
 2 Residential Customer Survey metrics, and targets been put forward
 3 previously?

4 A. Yes, separate metrics and targets for Customer Satisfaction were
 5 established within Con Edison's recently approved Joint Proposal based
 6 on the priority and urgency of the interaction.

7 Q. What targets does the Company propose for the Customer Satisfaction
 8 survey metrics?

9 A. As shown in Exhibit __ (CEP-4), the three-year average for High Priority
 10 interactions and General Account & Billing interactions was 3.58. The
 11 Company's proposed targets for High Priority Interactions and General
 12 Account & Billing Interactions are both 3.08 for calendar year 2025.
 13 These targets are shown in the table below.

Customer Satisfaction Index of General Account & Billing Interactions	
CSI Satisfaction Index	(NRA) BPs
≥3.08	None
<3.02	(2.5)
≤2.96	(5)
≤2.90	(7.5)
Customer Satisfaction Index of High Priority Interactions	
CSI Satisfaction Index	(NRA) BPs
≥3.08	None
<3.02	(2.5)
≤2.96	(5)
≤2.90	(7.5)

14

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1 These targets are reasonable, especially given the future customer
2 service challenges expected as a result of the historic levels of arrears
3 following the COVID pandemic, which is discussed in more detail below.

VI. THE COVID PANDEMIC AFTERMATH AND CUSTOMER ARREARS

5 Q. Please describe the current state of customer arrears following the
6 COVID-19 Pandemic?

7 A. Customer arrears balances have grown significantly since the Company
8 suspended collections activity for all customers in March of 2020. The
9 suspension of collection activities continued until very recently in light of
10 the COVID Pandemic, the Parker-Mosley Act of 2020, the Parker-
11 Richardson Act of 2021, and collection limitations included within the
12 Arrears Relief Programs. From February 2020 through June 30, 2023,
13 residential Arrears Balances greater than 60 days grew by 1,044% to \$96
14 million while non-residential arrears grew by 1,971% to \$29 million.
15 Additionally, the number of residential customers with arrears greater than
16 60 days has grown by 224% to 66,000, while the number of non-
17 residential customers with arrears has grown by 401% to 10,000.
18 Additionally, residential arrears balances less than 60 days have also
19 increased since the COVID-19 Pandemic to \$16 million while non-
20 residential arrears grew to \$11 million, which are 106% and 308%
21 increases, respectively. Additionally, although the Company has begun a
22 very measured approach to restarting collections activities, it is expected
23 that these balances will continue to grow prior to July 1, 2024.

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1 Q. In light of these historic arrears balances how has the Company
2 forecasted uncollectible expense for inclusion in this rate filing?

3 A. The suspension and measured restart of collection activities has
4 significantly distorted the data that would be necessary to develop an
5 accurate forecast of uncollectible expense. At this point, the Company
6 cannot reasonably predict the level of net write-offs that will occur in the
7 Rate Year. While there was an uptick in net write-offs experienced in the
8 historic year, this was primarily attributable to writing off arrears balances
9 for shuttered businesses and residential customers that vacated their
10 residences. At this time, there is a significant level of uncertainty
11 surrounding the level of net write-offs that may be experienced, as well as
12 the timing. As a result of the uncertainty, the Company is proposing that it
13 (1) maintain the rate allowance for the delivery portion of uncollectibles
14 that was provided for in the 2021 Rate Plan for the rate year ended June
15 30, 2024; (2) assume the same uncollectible % for fuel and other
16 surcharge components of the bill as established in the 2021 Rate Plan;
17 and (3) continue with modification the uncollectible true-up mechanism
18 afforded under the 2021 Rate Plan.

19 Q. Why does the Company anticipate uncertainty of net write-offs in the Rate
20 Year?

21 A. The Company's measured approach to collection activities will provide
22 time for customers to acclimate to collection activities and for the
23 Company to learn how to best help the customers that require assistance

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1 by determining eligibility for DPAs, the EAP, HEAP, etc. Reaching the
2 unprecedented number of customers in arrears will take time, and any
3 subsequently established DPAs will have a significant impact on timing of
4 when arrears may actually get written off.

5 Q. What are the proposed modifications to the existing true-up mechanism?

6 A. First, accompanying the uncertainty surrounding collections and bad debt
7 net write-offs is an uncertainty about future costs for collection agency
8 fees. As such, the Company proposes that the uncollectible true-up
9 mechanism should be extended to capture deferral for collection agency
10 fees over or under amounts included in rates. Second, currently the
11 Company's true-up mechanism requires that net write-offs compared to
12 bad debt billed exceed a threshold equivalent to ten basis points in order
13 for deferral to be allowed. For the reasons noted above regarding the
14 great uncertainty in the magnitude and timing of net write-offs, the
15 Company proposes that the ten basis point threshold be removed from the
16 operation of the true-up mechanism. With removal of the threshold,
17 customers and the Company will both be fully protected from future
18 uncertainty. It should also be noted that absent a true-up mechanism for
19 uncollectible expense, the rate allowances assumed in the development of
20 revenue requirements and the proposed uncollectible factors, which as
21 previously noted are all consistent with those established for the Rate
22 Year ended June 30, 2024, would have to be adjusted.

DIRECT TESTIMONY OF THE CUSTOMER EXPERIENCE PANEL

1 Q. In light of these historic arrears balances and uncertainty around net write-
2 offs, what treatment does the Company propose for the Residential
3 Service Terminations / Uncollectible Incentive Mechanism?

4 A. This metric was paused under the provisions of the 2021 Rate Plan. As
5 such, the Company proposes that this incentive mechanism continue to be
6 paused for the Rate Year.

7 Q. Is there a need for incremental personnel to implement the Company's
8 collection efforts?

9 A. Yes. The Company will require additional Collectors, Contact Center
10 personnel, and billing department personnel in order to carry out
11 collections efforts, address customer inquiries and concerns, match
12 customers with assistance programs and help customers through the
13 collection process.

14 Q. Please identify the rationale for the incremental Contact Center personnel
15 that will be required.

16 A. As shown in Exhibit __ (CEP-4) customer interactions associated with
17 collections activity is expected to grow significantly resulting in the need
18 for 33 incremental customer service full time equivalents ("FTEs"),
19 comprised of both full time and part-time employees. The number of
20 residential customers in arrears has increased from a pre-pandemic level
21 of approximately 21,000 to a current level of 66,000. During the pre-
22 pandemic period Central Hudson handled an annual average of 340,000
23 collection-related calls that correspond to the approximately 21,000

DIRECT TESTIMONY OF THE CUSTOMER EXPERIENCE PANEL

1 residential customers in arrears. Central Hudson is forecasting the level
2 of collection calls to increase at the same proportion as residential
3 customers in arrears resulting in approximately 1.1 million collection
4 related calls in 2024. In order to handle the expected significant influx of
5 collection calls while also meeting customer service expectations, the
6 Company will need to hire 33 incremental customer service FTEs and
7 continue an increased use of external call center personnel. Expense
8 associated with the external call center cost is estimated to be
9 approximately \$2.7 million in the Rate Year; this estimate was provided to
10 the Revenue Requirements Panel for inclusion in the development of
11 revenue requirements.

12 Q. Has the Company identified the need to create a group to focus directly on
13 difficult types of billing?

14 A. Yes. The Company recently created the Customer Billing Department.

15 Q. Please describe the purpose and role of the Customer Billing Department
16 that was created in August 2022.

17 A. The Customer Billing Department was assembled to handle three main
18 areas of billing: business process exception management ("BPEMs"),
19 customer contacts that require additional analysis, and facilitating accurate
20 and timely billing of complex billing accounts including: CDG, remote net
21 meter, net meter, time of use, demand, retail choice, budget bill, as well as
22 a combination of customer types therein.

DIRECT TESTIMONY OF THE CUSTOMER EXPERIENCE PANEL

1 Q. Please identify the rationale for the incremental Customer Billing
2 personnel that will be required.

3 A. As shown in Exhibit __ (CEP-4), 11 incremental Customer Billing
4 personnel will be hired during the bridge period and are required in order
5 to investigate an estimated 10% of the collections calls in order to provide
6 customers with greater certainty regarding the accuracy of their arrears
7 balances. These customer interactions will be necessary in order to
8 provide a positive customer experience and facilitate a positive customer
9 action associated with their arrears balance.

10 Q. Are there other personnel needs that you have identified?

11 A. Yes. We will need ten additional field collectors and one additional
12 supervisor will also be hired in the bridge period.

13 Q. Why does Central Hudson require these additional field collectors?

14 A. Central Hudson's field collector staffing compliment has traditionally been
15 at 11 FTEs, however since the COVID-19 Pandemic and the subsequent
16 locking restrictions this compliment currently stands at six. As discussed
17 previously, residential arrears greater than 60 days have increased
18 significantly and the Company is increasing the field collector workforce in
19 order to facilitate an orderly and measured approach to collections
20 activities associated with the unprecedented level of customer arrears.

DIRECT TESTIMONY OF THE CUSTOMER EXPERIENCE PANEL**VII. CUSTOMER PAYMENT BY DEBIT & CREDIT CARD**

- 1
- 2 Q. What is the Company's proposal regarding recovery of fees for customer
- 3 payments by debit card, credit card, or at third party walk-in locations?
- 4 A. With the change in the arrears and uncollectible landscape, as previously
- 5 discussed, there is significant uncertainty surrounding future customer
- 6 payment behavior. As a result, similar to the Company's treatment of
- 7 uncollectible expense, the Company is proposing that it maintain the rate
- 8 allowance established by the 2021 Rate Plan for the rate year ended June
- 9 30, 2024 and to assume that any variation will be captured through the
- 10 continued symmetrical deferral for this element of expense.
- 11 Q. Does this conclude your direct testimony at this time?
- 12 A. Yes, it does.

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419

2 MR. FITZGERALD: (Cont'g.)

3 Q. Panel, do you also have in front
4 of you a document entitled the rebuttal testimony of
5 the Customer Experience Panel consisting of
6 approximately 63 pages in question-and-answer format,
7 which was filed with the commission on December 19th,
8 2023 and updated on January 16th, 2023?

9 A. Yes.

10 Q. Was that document prepared by you
11 or under your supervision?

12 A. Yes.

13 Q. And do you have any changes or
14 corrections to the testimony?

15 A. No.

16 Q. And if I ask you the same
17 questions today, would your responses be the same?

18 A. Yes.

19 Q. And do you adopt this as your
20 sworn testimony in this proceeding?

21 A. Yes.

22 MR. FITZGERALD: Your Honor, I ask
23 that the rebuttal testimony of the customer
24 experience panel consisting of 63 pages approximately
25 of questions and answers be copied into the record as

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 if given orally today.

3 A.L.J. COSTELLO: Okay. The motion is
4 granted and the updated rebuttal testimony of the
5 Customer Experience Panel should be entered into the
6 record at this point as if orally given here today.

BEFORE THE
NEW YORK STATE
PUBLIC SERVICE COMMISSION

-----X

Proceeding on Motion of the Commission as to the
Rates, Charges, Rules and Regulations of
Central Hudson Gas & Electric Corporation
for Electric Service

Case 23-E-0418

-----X

-----X

Proceeding on Motion of the Commission as to the
Rates, Charges, Rules and Regulations of
Central Hudson Gas & Electric Corporation
for Gas Service

Case 23-G-0419

-----X

**REBUTTAL TESTIMONY OF THE
CUSTOMER EXPERIENCE PANEL**

December 19, 2023

REBUTTAL TESTIMONY OF THE CUSTOMER EXPERIENCE PANEL

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**REBUTTAL TESTIMONY OF THE CUSTOMER EXPERIENCE
PANEL**

I. INTRODUCTION

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Q. Please state the names of the members of the Customer Experience Panel ("Panel").

A. Our names are Jeffery D. Doane, Anthony S. Campagiorni, Joseph J. Hally, Lisa C. Kopp, Cheryl J. Ryan and Tom M. Su.

Q. Are there any changes to the Customer Experience Panel that sponsored direct testimony on behalf of Central Hudson Gas & Electric Corporation ("Central Hudson" or the "Company") in these proceedings?

A. Yes. Mr. Campagiorni, Mr. Hally, Ms. Kopp, Ms. Ryan and Mr. Su have been added to the Panel and Mr. Fuoco, Mr. Brandt and Mr. Vazquez are no longer members of the Panel.

Q. Mr. Campagiorni, please state your current employer and business address.

A. I am employed by Central Hudson and my business address is 284 South Avenue, Poughkeepsie New York, 12601.

Q. Mr. Campagiorni, in what capacity are you employed by Central Hudson and what is your scope of responsibilities?

A. My current position is Senior Vice President of Customer Services. In that capacity, I have overall responsibility for all matters pertaining to customer facing activities including the Company's Contact Center, Outreach, Collections, Meter Reading, Corporate Communications, Government

**REBUTTAL TESTIMONY OF THE CUSTOMER EXPERIENCE
PANEL**

1 Affairs, Demand Side Management and Energy Efficiency, New Business
2 and Commercial Operations.

3 Q. Mr. Campagiorni, what is your educational background and professional
4 experience?

5 A. I hold a Bachelor of the Arts in Political Science from Syracuse University,
6 a Juris Doctor from Seton Hall University School of Law, and a Master of
7 Public Administration from Marist College. From 1995 to 1998, I was an
8 attorney practicing commercial litigation for the firm of Heller & Laiks, P.A.
9 in New Jersey. From 1998 to 2001, I worked for Empire State
10 Development both as Counsel to the Department of Economic
11 Development in Albany and Director of Business Development in the Mid-
12 Hudson Regional office. From 2001 to 2002, I was Manager of Business
13 Development at Mirant Corporation in Suffern, New York. I was Director,
14 World Trade Business Recovery at Empire State Development in New
15 York City from 2002 to 2003. I was President and CEO of the Hudson
16 Valley Economic Development Corporation from 2003 to 2009 in New
17 Windsor, New York. In 2009, I joined Central Hudson as Assistant Vice
18 President with responsibilities for Governmental Affairs and Economic
19 Development. In 2010, I was promoted to Vice President and assumed
20 roles of increasing responsibility over the years in Energy Efficiency, Real
21 Property Services, Gas Marketing, Business Development and
22 Commercial Account Services, and Energy Transformation and Solutions

**REBUTTAL TESTIMONY OF THE CUSTOMER EXPERIENCE
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1 before assuming the position of Vice President of Regulatory and
2 Governmental Affairs in 2016. In 2018, I assumed additional
3 responsibilities for Customer Services and was the Vice President of
4 Customer Services and Regulatory Affairs. In late 2019, I was given
5 oversight of Gas Operations and was named Vice President of Customer
6 Services and Gas Operations. In 2021, I was promoted to Senior Vice
7 President with the same title. In January 2024, I assumed my current role
8 of Senior Vice President of Customer Services.

9 Q. Mr. Campagiorni, have you previously testified before the New York State
10 Public Service Commission ("PSC" or the "Commission")?

11 A. Yes, I have testified before the Commission in Cases 14-E-0318, 14-G-
12 0319, 17-E-0459 and 17-G-0460.

13 Q. Mr. Campagiorni, do you adopt the Panel's direct testimony filed in these
14 proceedings?

15 A. Yes.

16 Q. Mr. Hally, are you the same witness that sponsored testimony as part of
17 the Company's Policy Panel?

18 A. Yes.

19 Q. Mr. Hally, do you adopt the Panel's direct testimony filed in these
20 proceedings?

21 A. Yes.

**REBUTTAL TESTIMONY OF THE CUSTOMER EXPERIENCE
PANEL**

1 Q. Ms. Kopp, please state your current employer and business address.

2 A. I am employed by Central Hudson and my business address is 284 South
3 Avenue, Poughkeepsie New York, 12601.

4 Q. Ms. Kopp, in what capacity are you employed by Central Hudson and
5 what is the scope of your responsibilities?

6 A. I am employed by Central Hudson as Supervisor, Consumer Outreach. In
7 that capacity I oversee the Consumer Outreach team, the handling of
8 escalated complaints, and all outreach efforts done by the Company.

9 Q. Ms. Kopp, what is your educational background and professional
10 experience?

11 A. I attended Orange County Community College. I have been continuously
12 employed by Central Hudson since 2011 working as a Customer Service
13 Representative until 2021 when I moved to the Consumer Outreach
14 group.

15 Q. Ms. Kopp, have you previously testified before the Commission?

16 A. No, I have not.

17 Q. Ms. Kopp, do you adopt the Panel's direct testimony filed in these
18 proceedings?

19 A. Yes.

20 Q. Ms. Ryan, please state your current employer and business address.

21 A. I am employed by Central Hudson and my business address is 284 South
22 Avenue, Poughkeepsie New York, 12601.

**REBUTTAL TESTIMONY OF THE CUSTOMER EXPERIENCE
PANEL**

1 Q. Ms. Ryan, in what capacity are you employed by Central Hudson and
2 what is the scope of your responsibilities?

3 A. I am employed by Central Hudson as a Senior Program Manager. In this
4 position, I am responsible for ensuring that Central Hudson's SAP
5 Dunning implementation is in compliance with the Company's business
6 policies and procedures and New York State Rules and Regulations (e.g.,
7 Home Energy Fair Practices Act (HEFPA)).

8 Q. Ms. Ryan, what is your educational background and professional
9 experience?

10 A. I received a Bachelor of Arts Degree in Communication from the
11 University at Buffalo in 2002. Since 2003 I have been employed
12 continuously by Central Hudson in a variety of positions in Customer
13 Services. In addition to my current position, my prior responsibilities
14 included Customer Service Representative, Customer Account Services
15 Supervisor, Operating Supervisor Customer Account Services – Credit &
16 Collections and Director of Customer Care.

17 Q. Ms. Ryan, have you previously testified before the Commission?

18 A. Yes, I have testified before the Commission in Cases 17-E-0459 and 17-
19 G-0460.

20 Q. Ms. Ryan, do you adopt the Panel's direct testimony filed in these
21 proceedings?

22 A. Yes.

**REBUTTAL TESTIMONY OF THE CUSTOMER EXPERIENCE
PANEL**

1 Q. Mr. Su, please state your current employer and business address.

2 A. I am employed by Central Hudson and my business address is 284 South
3 Avenue, Poughkeepsie New York, 12601.

4 Q. Mr. Su, in what capacity are you employed by Central Hudson and what is
5 the scope of your responsibilities?

6 A. I am employed by Central Hudson as the Program Manager – Meter
7 Services. In this position, I am responsible for managing the meter reading
8 department. I am responsible for ensuring customer meters are efficiently
9 read and processed correctly by the meter reading system.

10 Q. Mr. Su, what is your educational background and professional
11 experience?

12 A. I received a Bachelor of Science Degree in Computer Science from Marist
13 College in 2001. I have been employed by Central Hudson since 2004 in a
14 variety of positions including IT Analyst, Supervisor of Meter Reading and
15 System Support, Operating Supervisor – Customer Account Services
16 Technology and PV and District Director – DER. I have been in my current
17 position since August 2022.

18 Q. Mr. Su, have you previously testified before the Commission?

19 A. No, I have not.

20 Q. Mr. Su, do you adopt the Panel's direct testimony filed in these
21 proceedings?

22 A. Yes.

REBUTTAL TESTIMONY OF THE CUSTOMER EXPERIENCE PANEL

II. PURPOSE OF TESTIMONY

Q. What is the overall purpose of your rebuttal testimony?

A. The purpose of our rebuttal testimony is to respond to certain portions of the prepared testimonies of Staff's Consumer Services Panel ("SCSP"), the Public Utility Law Project ("PULP"), Communities for Local Power ("CLP"), and the Utility Intervention Unit, Division of Consumer Protection, Department of State ("UIU"), and to discuss the following key points:

1. To note the Company's position on SCSP's proposed changes to the Company's current Customer Service Performance Indicator ("CSPI") metrics which include Public Service Commission Complaint Rate ("PSC Complaint Rate"), Percent of Calls Answered by a Representative within 30 Seconds ("Call Answer Rate"), and the Residential Customer Satisfaction Survey, as well as SCSP's proposed new CSPI regarding Estimated Bills;
2. To recommend the rejection of SCSP's proposed adjustments to CSPI Negative Revenue Adjustments ("NRAs"), including the addition of 18 basis points ("bps") associated with SCSP's proposed Estimated Bills metric as well as SCSP's recommendation to triple the Company's maximum NRA exposure if more than one CSPI target is missed, and triple and quadruple the NRAs for missed performance in consecutive years;

**REBUTTAL TESTIMONY OF THE CUSTOMER EXPERIENCE
PANEL**

- 1 3. To comment on SCSP's proposal to establish a credit mechanism for
- 2 adjusted billing of community distributed generation estimated bills and
- 3 other adjusted bills;
- 4 4. To clarify requirements for the successful implementation of monthly
- 5 meter reading including the need for appropriate staffing;
- 6 5. To address SCSP's concerns with the growing number of customers in
- 7 arrears and arrears levels and provide detail on the Company's plan to
- 8 begin service terminations of residential customers in the Rate Year;
- 9 6. To rebut SCSP's proposed elimination of technology capital projects
- 10 that will enhance customer experience. This includes investment in
- 11 the Company's Interactive Voice Response ("IVR"), customer web and
- 12 mobile technology, bill redesign, and payment and billing experience
- 13 improvements;
- 14 7. To address the adjustment to the monthly bill discount for Energy
- 15 Affordability Program ("EAP") and EAP rate allowance; and
- 16 8. To comment on SCSP's recommendation for changing the way jobs
- 17 created or retained are tracked and comment on SCSP's
- 18 recommendation to add additional reporting criteria to the annual
- 19 Economic Development report.

20 Q. Is the Panel sponsoring any exhibits?

21 A. Yes. This Panel is sponsoring the following exhibits:

REBUTTAL TESTIMONY OF THE CUSTOMER EXPERIENCE PANEL

1 Exhibit __ (CEP-1R) includes responses from other parties to IRs relied
2 upon in the development of the Panel's rebuttal testimony;
3 Exhibit __ (CEP-2R) provides the Central Hudson Gas & Electric
4 Customer Service Performance Dashboard updated December 4, 2023;
5 Exhibit __ (CEP-3R) includes an analysis of customer comments made at
6 Public Statement Hearings;
7 Exhibit __ (CEP-4R) includes documentation to support the impact of
8 commodity pricing related to PSC cases;
9 Exhibit __ (CEP-5R) provides examples of communications distributed by
10 the Company to advise customers about supply prices and their impact on
11 customers' bills;
12 Exhibit __ (CEP-6R) includes an analysis of the correlation between CSPI
13 metrics and commodity price;
14 Exhibit __ (CEP-7R) includes information documenting historical
15 Customer Satisfaction metrics associated with proposed targets;
16 Exhibit __ (CEP-8R) includes the 2015 through 2022 call answer rate
17 calculation and proposed CSPI target calculation;
18 Exhibit __ (CEP-9R) includes the Company proposed Estimated Bill CSPI
19 Target and NRA basis point levels;

REBUTTAL TESTIMONY OF THE CUSTOMER EXPERIENCE PANEL

1 Exhibit __ (CEP-10R) includes information regarding the monetary
2 impacts of Staff's proposed \$20 bill credits;
3 Exhibit __ (CEP-11R) summarizes the Company's Monthly Meter Reading
4 Communication Plan;
5 Exhibit __ (CEP-12R) provides documentation of timeline and milestones
6 related to the date of collections resumption; and
7 Exhibit __ (CEP-13R) identifies the collections program contact center
8 staffing requirements.

III. SAP-CIS TRANSITION STATUS

10 Q. Does the Panel have any initial comments regarding the SAP-Customer
11 Information System ("CIS") transition?

12 A. Yes, as stated in the direct testimony of the Panel, the Company
13 acknowledges that issues with its new SAP-CIS resulted in customer
14 confusion and anxiety, a rise in customer complaint levels, harsh criticism
15 from elected officials, and questions from the Commission and others
16 seeking to understand the problems with the SAP-CIS. Additionally, as
17 stated in the Panel's direct testimony, the Company has made significant
18 progress in remedying all customer billing issues as measured by the %
19 Current Bills, the % Bills Requiring Adjustments and Actual Bills Replaced
20 with Estimates. While all billing systems may produce a certain number of
21 customer billing issues given the inherent complexity of bill calculation and

**REBUTTAL TESTIMONY OF THE CUSTOMER EXPERIENCE
PANEL**

1 processing, at this time, customers are receiving accurate and timely bills
2 within normal operating parameters.

3 Q. Does SCSP comment on customer billing issues?

4 A. Yes, SCSP states that customers are still experiencing issues with the
5 Company's billing and points to the elevated number of customer
6 complaints received by the Office of Consumer Services ("OCS") and the
7 comments received at recent Public Statement Hearings expressing
8 continued frustration and confusion regarding the Company's billing.

9 Q. Does the Panel agree that PSC Complaints received and customer
10 comments at Public Statement Hearings are an appropriate barometer for
11 continued SAP-CIS billing issues?

12 A. No, the Panel does not agree that these are appropriate measurements of
13 customer billing issues and instead would point back to Exhibit __ (CEP-
14 2R). Exhibit __ (CEP-2R) shows the level of % Current Bills, the % Bills
15 Requiring Adjustments and Actual Bills Replaced with Estimates, which
16 are now within normal operating levels. Additionally, the Panel notes that
17 PSC Complaints received are a lagging indicator and will likely take time
18 to return to normal levels as the Company rebuilds customer trust.

19 Q. Are there other drivers of PSC Complaints received beyond issues related
20 to the SAP-CIS transition?

21 A. Yes, as the Panel will discuss later in its rebuttal testimony, commodity
22 prices as well as other factors are related to the number of PSC

**REBUTTAL TESTIMONY OF THE CUSTOMER EXPERIENCE
PANEL**

1 Complaints received and may result in an outsized number of PSC

2 Complaints.

3 Q. Does the Panel have remarks on the use of comments received at Public
4 Statement Hearings as a measurement of the existence of continued
5 billing issues?

6 A. Yes, although it is important to understand the tone of customer
7 comments and react to customer concerns, Public Statement Hearing
8 comments are not an appropriate measure of billing system issues.

9 Q. Has the Panel performed any analysis of the customer comments
10 received at the Public Statement Hearings?

11 A. Yes, the Panel analyzed the 114 comments received at the in-person
12 Public Statement Hearings held in Poughkeepsie, Newburgh, Kingston,
13 and Catskill. Based on the analysis included in Exhibit __ (CEP-3R), out
14 of the 114 speakers that provided comments only 7 (or approximately 5%)
15 had unresolved issues, primarily open PSC Complaints, at the time they
16 provided their comments. The analysis shows that the majority of billing
17 issue comments were regarding past billing issues and so the comments
18 appear to be a lagging indicator of customer frustration. Given that the
19 vast majority of commenters did not have unresolved billing issues, the
20 comments cannot be used as a barometer of ongoing billing issues.

**REBUTTAL TESTIMONY OF THE CUSTOMER EXPERIENCE
PANEL**

1 Q. Does the Panel have any additional comments regarding SCSP's
2 approach to the SAP-CIS billing transition?

3 A. Yes, as will be discussed in greater detail later in the Panel's testimony it
4 appears that SCSP used the SAP-CIS billing transition as an opportunity
5 to propose inappropriate increases to the potential impact of NRAs, apply
6 punitive bill credits to expected and acceptable levels of operating
7 performance, and remove resources required to complete key initiatives
8 such as collections and monthly meter reading. The Panel will provide
9 additional support and evidence as to why each of these
10 recommendations should be rejected.

11 **IV. CSPI TARGETS AND NEGATIVE REVENUE ADJUSTMENTS**

12 Q. Before discussing the specific CSPIs, please comment on Staff's
13 recommendation that any CSPI targets and NRAs adopted in these
14 proceedings be applicable to calendar year 2024.

15 A. Since the CSPIs are calendar year metrics, any new or modified CSPIs
16 adopted in these proceedings should not start until January 1, 2025. Any
17 start date earlier than that date may not allow for the complete resolution
18 of these rate cases and for the Company to have knowledge of the
19 available resources and the target that it is trying to achieve.

**REBUTTAL TESTIMONY OF THE CUSTOMER EXPERIENCE
PANEL**

A. PSC COMPLAINT RATE

Q. Does SCSP support the Company's proposal for modifications to the PSC Complaint Rate metric?

A. No. SCSP disagrees with the Panel's recommendation to exclude from the calculation of the metric complaints associated with commodity prices that are outside of the Company's control. The basis for SCSP's disagreement is its assertion that the Company has not demonstrated that it can accurately determine whether commodity prices are the root cause of a complaint.

Q. Is the Company able to demonstrate that it can accurately determine whether commodity prices are the root cause of a complaint?

A. Yes. As shown in Exhibit __ (CEP-4R), the Company has the ability to determine whether commodity prices are the root cause of a complaint. The category identified as "PRICING-bill is correct" indicates cases where the Company has identified the root cause of the concern to be commodity pricing. Through the complaint analysis process, commodity pricing is identified as the root cause of a complaint when the Company has verified that actual meter reads have been billed bi-monthly and there are no other complaints regarding the handling of other account activity.

**REBUTTAL TESTIMONY OF THE CUSTOMER EXPERIENCE
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1 Q. Does SCSP cite other reasons for not excluding commodity prices from
2 the calculation of the PSC Complaint Rate?

3 A. Yes, SCSP states the exclusion would not encourage proactive
4 communication by the Company to its customers regarding commodity
5 prices.

6 Q. Does the Panel agree with this rationale?

7 A. No, Central Hudson does not agree with this premise for two reasons.
8 First, Central Hudson's efforts to communicate the impact of rising or
9 variable supply prices on a customer's overall bill has been ongoing for
10 many years and is unrelated to our analysis of the nature of PSC
11 Complaints. The Company makes extensive efforts to communicate with
12 customers on the components of electric and gas bills so that customers
13 can actively manage their accounts and be informed consumers. This
14 includes communicating with customers about supply prices versus
15 delivery prices, the variable nature of supply prices, and what some of the
16 drivers are behind supply prices. Please see Exhibit __ (CEP-5R) for
17 examples of communications the Company has previously made to advise
18 customers of supply/commodity price impacts. Second, due to the
19 overlapping nature of Central Hudson's current CSPI metrics, a lack of
20 communication regarding commodity prices would likely increase call
21 volume, which may impact the Company's ability to achieve its Call
22 Answer Rate and would likely negatively impact the results of the

REBUTTAL TESTIMONY OF THE CUSTOMER EXPERIENCE PANEL

1 Residential Customer Satisfaction Survey. Therefore, Central Hudson's
2 communication to its customers regarding commodity prices will still be
3 linked to potential NRAs and the Company will still be incentivized to
4 proactively communicate with customers on commodity prices.

5 Q. Does the Panel have any other comments regarding the PSC Complaint
6 Rate and its relationship to commodity prices?

7 A. Yes. As shown in Exhibit __ (CEP-6R), complaints and commodity prices
8 are correlated. Specifically, there is a 54% and 63% correlation between
9 PSC Complaints received and electric and gas supply prices, respectively.
10 This correlation is much stronger than the correlation that exists between
11 the number of estimated bills and PSC Complaints received, which further
12 justifies the need to remove market-driven commodity price complaints
13 outside of the control of the Company from the PSC Complaint Rate
14 metric.

15 **B. RESIDENTIAL CUSTOMER SATISFACTION SURVEY**

16 Q. What are Staff's recommendations with respect to the Residential
17 Customer Satisfaction Survey metric?

18 A. Staff agrees with the Company's proposal to implement a transaction-
19 based survey with each transaction included in one of two categories and
20 to convert the Residential Customer Satisfaction Survey methodology to
21 the Statewide Pilot Survey methodology. Staff, however, opposes the
22 Company's proposal to move the metric to an index value, rather than

**REBUTTAL TESTIMONY OF THE CUSTOMER EXPERIENCE
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1 percentage, and recommends that the Commission maintain the
2 Company's current survey target of 89% for each of the two survey
3 participant groups, meaning that 89% of the responses must be rated
4 either a "4" for "Satisfied" or a "5" for "Very Satisfied."

5 Q. Does the Panel agree with Staff's recommendation that the Commission
6 maintain the Company's current survey target of 89% for each of the two
7 survey participant groups?

8 A. No, for several reasons. First, comparing the historic relationship
9 observed between the results of the existing Residential Customer
10 Satisfaction Survey and the results of the Statewide Pilot Survey shows
11 that, on average, the Statewide Pilot Survey results are 17% lower than
12 the existing Residential Customer Satisfaction Survey results. This
13 historic relationship was observed from 2019 through 2022 and is
14 provided in Exhibit __ (CEP-7R). Based on this historic relationship, it is
15 unreasonable to base the target for the Statewide Pilot Survey on the
16 results from the Residential Customer Satisfaction Survey. At a minimum,
17 if the Commission does not agree to move this metric to an index value,
18 the 17% difference between the survey results should be used to reduce
19 the target for this metric from 89% to 72%. Secondly, as noted by the
20 SCSP, approximately 67,000 residential customers or nearly 27% of all
21 residential customers are currently in arrears. It is unlikely that these
22 customers are going to rate their experience as either a "4" for "Satisfied"

**REBUTTAL TESTIMONY OF THE CUSTOMER EXPERIENCE
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1 or a “5” for “Very Satisfied.” Therefore, the Residential Customer
2 Satisfaction Survey target should be further reduced by 13% to reflect the
3 likely lower ratings from customers in arrears.

4 Q. How did the Panel arrive at the 13% reduction?

5 A. The Panel arrived at the 13% figure by estimating that 27% of the
6 respondents to the survey are customers in arrears and that a
7 conservative 50% of those respondents provide a response of less than
8 “4” for “Satisfied.” It is these respondents that the Company proposes to
9 exclude from the development of the target.

10 Q. If the Commission continues to maintain a percentage target for this
11 metric, what is the Panel’s recommendation?

12 A. The target should be set at 59% to reflect both of the Company’s
13 recommended adjustments as shown in Exhibit __ (CEP-7R). The Panel
14 notes that, when this figure is converted to a five-point index scale, the
15 target level is close to what the Panel initially proposed in its direct
16 testimony.

17 Q. What is the Panel’s recommendation for the Residential Customer
18 Satisfaction Survey?

19 A. We propose the Commission adopt the Panel’s proposal set forth in the
20 Panel’s direct testimony and that the metric be moved to an index value,
21 rather than percentage, and be set at 3.08. If the Commission rejects this

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1 proposal, the Residential Customer Satisfaction Survey target should be
2 set at 59% for the reasons previously discussed.

3 **C. PERCENT OF CALLS ANSWERED WITHIN 30 SECONDS**

4 Q. Did SCSP propose any changes to the Company's proposed target for the
5 Percent of Calls Answered within 30 Seconds?

6 A. No. However, SCSP did point out a calculation error within the
7 Company's past calculations of the Percent of Calls Answered within 30
8 Seconds.

9 Q. Please describe the calculation error that SCSP identified.

10 A. SCSP points out that the November 18, 2021 Order Adopting Terms of
11 Joint Proposal and Establishing Electric and Gas Rate Plan in Cases 20-
12 E-0428 and 20-G-0429, defines the calculation of this metric as:
13 percentage of calls answered by a Company representative within 30
14 seconds of the customer's request to speak to a representative between
15 the hours of 8:00 PM and 4:30 PM Monday through Friday (excluding
16 holidays). However, the Company has historically calculated this metric
17 as: the sum of the system-wide number of calls answered by a
18 representative within 30 seconds (including callbacks) divided by total
19 number of calls answered (including callbacks).

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1 Q. Does SCSP recommend any other changes to the calculation
2 methodology?

3 A. Yes, SCSP proposes that calls abandoned within 30 seconds should be
4 subtracted from the denominator of the metric calculation and states that
5 this normalization would align with the calculation in the August 4, 2017
6 Order Adopting Revisions to Customer Service Performance Reporting
7 Metrics ("CSPI Order") in Case 15-M-0566.

8 Q. Had the Company utilized Staff's calculation methodology for the Percent
9 of Calls Answered within 30 Seconds metric, what would have been the
10 impact?

11 A. The Company would have recorded an NRA of \$150,000, \$600,000, and
12 10 basis points in 2020, 2021, 2022, respectively.

13 Q. Does the Company agree with SCSP's calculation corrections?

14 A. Yes, with one exception. The Company maintains that customer callbacks
15 should be included within the numerator and denominator of the
16 calculation and that this inclusion aligns with the intent and purpose of the
17 Percent of Calls Answered within 30 Seconds metric.

18 Q. Please describe a callback and why it should be included within the
19 calculation.

20 A. A callback is an option available to customers who wish to have a
21 Company representative call them back rather than wait in a hold status
22 for a customer service representative. This is further detailed in the

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1 Company's response to DPS-718 provided in Staff's Exhibit __ (SCSP-1).
2 Callbacks also allow representatives to be better prepared for the
3 conversation by reviewing the customer's information and context before
4 making the return call. Offering a callback option can reduce the number
5 of abandoned calls, as customers who might otherwise hang up due to
6 long wait times can opt for a callback instead. Including callbacks within
7 the Percent of Calls Answered within 30 Seconds metric ensures that the
8 customers that chose this option will be included in the overall CSPI
9 measurement.

10 Q. Had the Company utilized a modified Staff calculation methodology for the
11 Percent of Calls Answered within 30 Seconds metric that includes
12 customer callbacks, what would have been the impact?

13 A. The Company would have recorded an NRA of \$600,000, and 10 basis
14 points in 2021 and 2022, respectively, but would not have recorded an
15 NRA of \$150,000 in 2020.

16 Q. Does the Company have any further proposals regarding the Percent of
17 Calls Answered within 30 Seconds metric?

18 A. Yes, the target for the Percent of Calls Answered within 30 Seconds
19 should be aligned with the Company's actual performance based on a
20 modified Staff calculation methodology that includes customer callbacks
21 for the period 2015 through 2019 in lieu of the Company's performance
22 utilizing the incorrect calculation for the period 2015 through 2019. This

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1 change is shown in Exhibit __ (CEP-8R) and results in targets of 63%,
2 57%, and 52% for tiers one, two, and three respectively. In addition, to
3 provide our customers with targeted levels of customer service
4 performance, it is necessary to have available the appropriate amount of
5 internal and external resources especially in light of future collections
6 efforts. The need for these resources was discussed in the Panel's direct
7 testimony and will be further addressed later in this testimony.

8 Q. Does the Company have any final comment regarding the Percent of Calls
9 Answered within 30 Seconds?

10 A. Yes. In recognition of the desire to mitigate customer bill impacts, the
11 Panel proposes that the NRAs associated with the Percent of Calls
12 Answered within 30 Seconds CSPI for years 2021 and 2022 could be
13 utilized as a rate moderator to offset costs associated with hiring the
14 incremental resources necessary for achieving targeted customer service
15 performance levels during the Rate Year.

D. ESTIMATED BILLS

17 Q. Please describe SCSP's proposals associated with the Estimated Bills
18 CSPI metric target and NRA level.

19 A. SCSP proposes an Estimated Bill metric that includes a four-tiered
20 structure with an associated basis point NRA value for each tier. The tiers
21 would be based on the annual average percentage of customer bills
22 rendered based on an estimated meter read in each calendar month. The

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1 first tier (worth 0 bps) would apply if 1% or less of the Company's bills are
2 issued with an estimated meter read, the second tier (worth 8 bps) would
3 apply between levels greater than 1% and less than or equal to 4.5%, the
4 third tier (worth 14 bps) would apply between levels greater than 4.5% and
5 less than 10%, and the fourth tier (worth 18 bps) would apply if 10% or
6 greater of bills are issued with an estimated meter read.

7 Q. Does the Panel agree with the CSPI metric target and NRA level?

8 A. No. First, we disagree with the target levels proposed for tiers 1 through 4
9 and propose setting target levels utilizing a methodology consistent with
10 Staff's traditional methodology for the development of CSPIs targets.
11 Second, we disagree with the number of basis points associated with each
12 tier.

13 Q. Please describe the Company's proposal for establishing the tiers for this
14 metric.

15 A. The Company proposes establishing the target for each tier based on
16 Staff's traditional methodology for determining CSPI targets that uses a
17 five-year historical performance average with tiers set at intervals of 2
18 standard deviations.

19 Q. Which five-year period does the Panel propose to utilize?

20 A. The Panel proposes using the period 2015 through 2019, which would
21 inherently and appropriately exclude any impacts from the COVID-19
22 Pandemic or the transition to the SAP-CIS.

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1 Q. What are the Panel's recommended tiers?

2 A. As shown in Exhibit __ (CEP-9R), this approach would result in the first
3 tier applying if 3.5% or less of the Company's bills are issued with an
4 estimated meter read, the second tier applying between levels greater
5 than 3.5% and less than or equal to 4.9%, the third tier applying between
6 levels greater than 4.9% and levels less than 6.3%, and the fourth tier
7 applying if 6.3% or greater of bills are issued with an estimated meter
8 read.

9 Q. Please describe the Panel's disagreement with the number of basis points
10 assigned to each tier by Staff.

11 A. For reasons more fully explained later in this testimony, the Panel does
12 not believe that an additional 18 bps of NRA exposure is appropriate. The
13 Panel proposes to spread the Company's existing 42 bps of NRA
14 exposure evenly across the four CSPI metrics that SCSP proposed.
15 Doing so results in 10.5 bps assigned to the Estimated Bill metric with the
16 first tier assigned 0 bps, the second tier assigned 4.5 bps, the third tier
17 assigned 8 bps, and the fourth tier assigned 10.5 bps.

18 Q. Does SCSP define their proposed Estimated Bill metric?

19 A. Yes, SCSP defines the estimated bill metric as a percentage that is
20 calculated by dividing the number of estimated bills, as defined in the
21 CSPI Order, by the number of scheduled actual readings. The SCSP
22 notes that the CSPI Order states an "estimated bill occurs when the utility

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1 renders a bill based on an estimated reading because it did not obtain an
2 actual reading at the time of a regularly scheduled meter reading.” Under
3 Staff’s proposal, all estimated readings would appear to be included within
4 the Estimated Bill CSPI calculation.

5 Q. Does the Company agree that all estimated bills should be included in the
6 Estimated Bill CSPI calculation?

7 A. No. For the reasons described further below, the two exclusions proposed
8 by SCSP for the estimated bill credit and an additional exclusion described
9 below, should also apply to the Estimated Bill CSPI calculation.

10 Q. What two exclusions does SCSP propose for the estimated bill credit?

11 A. Within its response to CH to DPS (005), included in Exhibit __ (CEP-1R),
12 SCSP confirmed that two types of estimated meter reads would be
13 excluded from their estimated bill credit proposal: 1) a regularly scheduled
14 estimated meter reading; and 2) instances where the Company must rely
15 on estimated usage because the customer and/or other person who
16 controls access to the meter refuses to provide access. These types of
17 estimated meter reads along with a third type discussed below, should be
18 excluded from the Estimated Bill CSPI calculation.

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1 Q. Why does the Panel believe that an exclusion is necessary if the
2 Company must rely on estimated usage because the customer and/or
3 other person who controls access to the meter refuses to provide access?

4 A. If the Company cannot access the meter the resulting estimated bill
5 should be excluded. Access to Company-owned metering equipment can
6 be refused outright by the customer, locks changed, and new keys not
7 provided to the utility. Property gates surrounding buildings and properties
8 as well as access roads are found locked, and keys are not provided upon
9 request by the utility. Meters can be blocked in basements or outside by a
10 multitude of items such as building materials, furniture, trash, etc. Meters
11 are also rendered inaccessible because of guard dogs that are not
12 controlled or restrained by homeowners. These issues are outside of the
13 control of the Company and should not result in a negative financial
14 impact on the Company.

15 Q. What is the additional exclusion the Panel is proposing?

16 A. Estimated meter reads due to abnormal operating conditions that are
17 outside of the Company's control should also be excluded from the
18 measurement of this metric. Abnormal operating conditions are deemed
19 to occur during any period of emergency, catastrophe, strike, natural
20 disaster, major storm, or other unusual event not in the Company's control
21 affecting more than 10% of the customers in an operating area during any
22 month. A major storm will have the same definition as set forth in 16

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1 NYCRR Part 97. These conditions are likely to interrupt normal meter
2 reading activities or require meter readers to perform storm roles, which
3 will result in a greater number of estimated bills as meter readers assist to
4 restore service to customers.

6 E. NEGATIVE REVENUE ADJUSTMENTS

7 Q. Does SCSP propose any significant changes to the number of basis
8 points associated with NRAs?

9 A. Yes. SCSP proposes four significant changes. First, SCSP proposes
10 increasing the maximum NRA basis points associated with the Company's
11 current CSPI metrics from 42 bps to 54 bps. Second, SCSP proposes a
12 new Estimated Bill metric with an incremental maximum NRA of 18 bps.
13 Third, SCSP proposes that NRA values triple if the targets for two CSPI
14 metrics are missed in one year, which would result in a maximum NRA for
15 each metric of 54 bps and a maximum NRA for all four SCSP proposed
16 metrics of 216 bps, an increase of 414% from the current level of 42 bps.
17 Finally, SCSP proposes that if the Company misses any of the CSPI
18 metric targets in one year and then misses any of the CSPI metric targets
19 the following year, the maximum NRA for each metric would quadruple
20 producing a maximum NRA for each metric of 72 bps and a maximum
21 NRA for all four metrics of 288 bps, an increase of 586% from the current
22 level.

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1 Q. Is the Panel concerned with the level of NRAs that SCSP is proposing?

2 A. Yes, the Company has significant concerns with the level of NRAs
3 proposed by SCSP. First, the Company believes that this potential
4 maximum NRA level is excessive and overly punitive. Second, as
5 discussed further within the rebuttal testimonies of the Company's Finance
6 Panel and Company Witness Nowak, the proposed NRA levels result in
7 significant financial uncertainty for the Company and its debt and equity
8 investors, which will lead to higher financing costs for customers. Third,
9 the CSPI metrics are strongly correlated with one another, and it is
10 inappropriate to triple the NRA level for failure of more than one metric in
11 the same year given the relationship between the metrics. Finally, the
12 CSPI metrics are strongly correlated with commodity price fluctuations and
13 an NRA should not be assessed due to market conditions beyond the
14 Company's control.

15 Q. Please describe the relationship that the CSPI metrics have with one
16 another.

17 A. Within Exhibit __ (CEP-6R), the Panel calculated the correlations between
18 the four CSPI metrics SCSP proposed and the correlations between the
19 CSPI metrics and electric and gas supply prices for the period 2018
20 through 2022. As shown in Exhibit __ (CEP-6R), Customer Satisfaction
21 and PSC Complaints received have a correlation of 81%, meaning that it
22 is very likely that a downward trend in customer satisfaction will be

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1 accompanied by a higher number of PSC Complaints being received.
2 Additionally, Estimated Bills as reported in the performance indicator
3 report has a 29% correlation with the number of PSC Complaints received
4 and a 45% correlation with Customer Satisfaction rate. These
5 relationships show that these metrics are strongly related to one another
6 and that the tripling of NRA values for missing more than one NRA in a
7 given year is neither just nor appropriate.

8 Q. Did the Panel find a relationship between the four CSPI metrics and
9 electric and gas commodity prices?

10 A. Yes, electric supply price has a correlation of 58% with Customer
11 Satisfaction, 54% with PSC Complaints received, and 16% with the
12 number of calls the Company receives that request to speak with a
13 Customer Service Representative. Additionally, gas supply price has a
14 correlation of 71% with Customer Satisfaction, 63% with PSC Complaints
15 received, and 32% with the number of calls the Company receives that
16 request to speak with a Customer Service Representative. These
17 correlations suggest that market-driven changes in electric and gas supply
18 prices are related to high PSC Complaints received, lower Customer
19 Satisfaction, and a higher number of calls received by the Company that
20 request to speak with a CSR. Therefore, in times of commodity price
21 increases it is more likely that the Company will fail one or more of
22 SCSP's proposed CSPI metrics than during periods of stable commodity

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1 prices. Since commodity price fluctuations are largely outside of the
2 Company's control, this is one more reason that SCSP's proposed tripling
3 of NRA values for missing more than one NRA in a given year should not
4 be adopted.

5 Q. Did SCSP review the relationships between the proposed CSPI metrics
6 and between the CSPI metrics and commodity prices?

7 A. Based on SCSP's response to CH to DPS (056), included in Exhibit ____
8 (CEP-1R), it does not appear that SCSP assessed the relationships
9 among the proposed CSPI metrics or between the proposed CSPI metrics
10 and commodity prices when it developed the Staff proposal.

11 Q. Does the Panel have an alternate proposal for the number of basis points
12 that should be assigned to NRAs?

13 A. Yes, the maximum NRA exposure associated with all CSPIs should
14 remain at 42 bps. Additionally, if an Estimated Bills CSPI and associated
15 NRA are established within this proceeding, that new metric should be
16 included within the 42 bps maximum exposure and the 42 bps should be
17 spread across all four CSPI metrics so that each CSPI is assigned a
18 maximum NRA level of 10.5 bps. A maximum NRA exposure level of 42
19 bps equates to approximately 5% of Staff's proposed ROE of 9.2% or 4%
20 of the Company's proposed 9.8% ROE and would be considered a
21 material financial impact and provides significant motivation for avoidance.

22 Q. Do you have any other comments on Staff's proposed increase in NRAs?

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1 A. Yes, Staff's testimony rejects many of the Company's proposed
2 investments (e.g., technology and incremental FTEs) that are required to
3 maintain the current level of service that customers expect. The
4 combination of Staff's proposed increase in NRA exposure and reduction
5 in investments creates an untenable situation and sets the Company up
6 for failure. If Central Hudson is going to be held accountable for
7 performance, it must be given the tools and ability to meet and exceed
8 reasonable targets.

F. CUSTOMER BILL CREDITS

10 Q. Did SCSP propose new customer bill credits?

11 A. Yes, SCSP proposed a \$20 bill credit for each estimated bill, adjusted bill,
12 or adjusted community distributed generation ("CDG") bill that a customer
13 receives.

14 Q. Does the Company object to this proposal?

15 A. Yes, the Company objects to this proposal for the following reasons: 1)
16 some level of estimated bills and adjusted bills are normal, required, and
17 expected within every billing system. The practice of issuing an estimated
18 or adjusted bill is contemplated and allowed under New York State Public
19 Service Law and the Company's tariffs. Establishment of a bill credit for
20 every single estimated and adjusted bill will result in an inappropriate
21 financial impact to the Company for routine billing estimates and
22 corrections; 2) the establishment of an estimated bill credit is redundant to

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1 the Estimated Bill CSPI proposed by SCSP and results in an overly
2 punitive mechanism especially during periods when the Company meets
3 the Estimated Bill CSPI performance target; 3) establishment of an
4 adjusted bill credit and a CDG adjusted bill credit is by definition redundant
5 and overly punitive; 4) per Staff's response to CH to DPS (016) and CH to
6 DPS (027), included within Exhibit __ (CEP-1R), the amount of \$20 was
7 arbitrarily based on the existing Missed Appointment bill credit; and 5) the
8 development of a fixed dollar amount bill credit is inappropriate and
9 unfairly penalizes smaller utilities relative to larger utilities.

10 Q. Are there reasons that adjustments to CDG bills may be required that are
11 outside of the control of the Company and should be excluded from any
12 potential CDG adjusted bill credit?

13 A. Yes. The CDG program requires collaboration between the utility and the
14 host. It also requires understanding of the program by the subscriber.
15 Subscriber additions, issues related to host enrollment and disenrollment
16 can and do occur requiring rebilling of subscribers.

17 Q. Does the Company have other concerns regarding the proposed CDG
18 adjusted bill credit?

19 A. Yes, CDG hosts are competing with one another for subscribers and the
20 primary differentiating factors between CDG hosts are pricing and billing
21 structures. To create competitive advantages, CDG hosts continue to ask
22 the Commission for changes to allowable billing designs that if approved

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1 will need to be accommodated by the Company's billing system. New
2 CDG-related billing changes cannot always be anticipated or pre-
3 programmed and therefore are generally performed manually. Manual
4 billing processes are subject to human error and may result in adjusted
5 bills. The Company has significant concerns that future mandated billing
6 system changes will increase the number of adjusted and CDG adjusted
7 bills and result in unfair financial impacts to the Company under Staff's
8 proposal.

9 Q. Please describe the financial impact of the \$20 bill credit for estimated
10 bills, adjusted bills, and CDG adjusted bills.

11 A. The financial impact of SCSP's proposed \$20 bill credit for estimated bills,
12 adjusted bills and CDG adjusted bills will vary based on the number of
13 occurrences. However, as shown in Exhibit __ (CEP-10R), at the average
14 level of occurrences experienced during 2018 and 2019 prior to the go-live
15 of the SAP-CIS, this \$20 bill credit would have resulted in an annual
16 financial impact of \$1.4 million for the estimated bill credit and \$1.0 million
17 for the adjusted bill credit. During this period of normal operations, the
18 financial impact would have equated to an annual total of \$2.4 million or a
19 14 bps reduction to the authorized ROE, which at normal service levels is
20 inappropriate and overly punitive.

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1 Q. Why does the Panel disagree with basing the bill credit amounts at the
2 existing \$20 bill credit for Missed Appointments?

3 A. A Missed Appointment has a unique customer impact and is more
4 controllable by the Company. However, adjusted bills and estimated bills
5 are driven by a large number of factors many of which are not within the
6 control of the Company. Furthermore, SCSP provides no rationale for
7 equating the customer inconvenience, customer cost, or Company control
8 associated with Missed Appointment bill credit to the other three bill
9 credits SCSP proposed.

10 Q. Do any of Central Hudson's peer utilities have a bill credit for estimated
11 bills or adjusted bills?

12 A. No.

13 Q. Do any of Central Hudson's peer utilities have a bill credit associated with
14 CDG adjusted bills?

15 A. Not exactly. In its response to CH to DPS (016), Staff indicated that a \$10
16 CDG credit was established in Cases 22-E-0317 et al. for New York State
17 Electric & Gas Corporation and Rochester Gas and Electric Corporation
18 (NYSEG/RG&E) and a \$10 CDG credit was established in Case 22-E-
19 0064 and 22-G-0065 for Consolidated Edison. However, it should be
20 noted that the bill credits in those cases are for different billing activities.

21 Q. Does the Panel believe that the Commission should reject the SCSP's
22 proposed \$20 bill credits?

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1 A. Yes, for the reasons just discussed.

2 **G. CSPI REPORTING**

3 Q. What are SCSP's proposed changes related to the CSPI metric report?

4 A. SCSP has recommended various changes, including: 1) modifying the title
5 of the annual report to Customer Service Performance Indicator Report to
6 align the monthly CSPI reports with the annual CSPI reports established in
7 rate cases; 2) developing and reporting a granular Call Hold Time metric;
8 3) developing and reporting a granular Call Abandonment Rate; 4)
9 developing and reporting a Call Handling Time metric; 5) enhanced
10 reporting associated with estimated meter reading and estimated bills; and
11 6) continuation of the reporting set forth in the Commission's Order
12 Approving Revised Billing Estimation Methods.

13 Q. Does the Panel agree with this recommendation to modify the title of the
14 annual report to Customer Service Performance Indicator Report to align
15 the monthly CSPI reports with the annual CSPI reports established in rate
16 cases?

17 A. Yes. The Panel agrees with the proposal to align the titles for the annual
18 CSPI and the monthly CSPI.

19 Q. Does the Panel agree with SCSP's recommendations that the existing
20 monthly CSPI reports be altered to include more granular data related to
21 call abandonment rates, call hold times, call handling times, call answer

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1 rates, consecutive months of estimated billing, and CDG customer bills
2 that have been issued within specific time frames?

3 A. The Panel has concerns regarding the SCSP's request because it does
4 not appear to take into consideration the additional resources or workload
5 required to perform additional reporting. Specific to consecutive months of
6 estimated billing and CDG customer bills being issued in specific time
7 periods, the Company will need resources to develop reporting to obtain
8 this data on an ongoing and consistent basis. The information the Panel
9 provided within relevant IR responses were results of various special
10 reports. Resources such as the Analysts that SCSP has proposed be
11 disallowed would be required to define reporting requirements, as well as
12 build, test, and maintain these reports. This would also apply to call
13 abandonment rates, call hold times, call handling times, and call answer
14 rates. As noted in the Proposed Changes to Capital Program section of
15 this testimony, these metrics would require an IVR upgrade to ensure
16 adherence to reporting requirements and accuracy. If these critical
17 investments are not funded, the Company should not be subject to the
18 more granular level of reporting proposed by SCSP.

V. CDG BILLING REPORTING

20 Q. Does SCSP recommend any reporting requirements related to CDG?

21 A. Yes, SCSP recommends the Company file CDG customer billing reports
22 on a quarterly basis with the Secretary to the Commission that include the

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1 total and percentage of CDG customer bills that have been issued within
2 the following time frames: 1) 30 days or less; 2) greater than 30 days, but
3 less than or equal to 60 days old; 3) greater than 60 days, but less than or
4 equal to 90 days old; 4) greater than 90 days, but less than or equal to
5 120 days old; and 5) greater than 120 days, but less than or equal to 150
6 days. Additionally, SCSP recommends the Company track and provide
7 monthly reports on the number of times a CDG customer bill is adjusted
8 within one billing period, or 30 days.

9 Q. Does the Panel agree with SCSP's proposed CDG reporting
10 recommendations?

11 A. The Panel agrees with the concept but notes that additional FTEs would
12 be needed to comply with these reporting requirements since they are
13 incremental and involve manual processes. The Panel discusses this
14 further below in relation to headcount requirements.

VI. MONTHLY METER READING

16 Q. Has the Company begun the transition to monthly meter reading?

17 A. Yes. As of December 19, 2023, the monthly meter reading project is well
18 underway. We have completed all functional unit testing and performed
19 an initial proof of concept, which includes reading meters for a small
20 customer population for two consecutive months and validation of
21 subsequent billing. Our next phase of the program will be concentrated on
22 ERT saturated routes to reduce immediate staffing needs.

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1 Q. What was the SCSP position regarding the Company's proposal for
2 monthly meter reading?

3 A. The SCSP stated that it generally supports a transition to monthly meter
4 reading for Central Hudson, however, they recommend the Commission
5 exclude the Company's proposed costs for monthly meter reading in
6 customers rates at this time due to: 1) concerns that the independent
7 monitor's written report regarding the Company's monthly meter reading
8 proposal may materially affect the Company's proposal; 2) concerns that
9 the Company has not fully planned the roll-out of this initiative, including
10 the customer education component; and 3) concerns with the cost
11 estimates and supporting analysis provided by the Company, including
12 vehicle purchases and additional internal FTEs and contracted resources.
13 The Panel will address each of these concerns.

14 Q. How does the Panel respond to SCSP's concern that the independent
15 monitor's report has not been released and may change the Company's
16 plan?

17 A. Although the independent monitor's report may include recommendations
18 regarding Central Hudson's monthly metering plan, at this time there is no
19 indication that the independent monitor's report will lead to material
20 changes or any changes in the Company's monthly meter reading plan.
21 Additionally, mechanisms can be developed to protect customers from any
22 changes to the final cost of the monthly meter reading plan and the

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1 potential impact of any changes associated with the final independent
2 monitor's report. For these reasons the Commission should reject this
3 rationale as a basis for not allowing the Company to recover the costs of
4 the monthly meter reading plan.

5 Q. How does the Panel respond to SCSP's concerns that the Company has
6 not fully planned the roll-out of this initiative, including the customer
7 education component?

8 A. While SCSP asserts that the Company's response to DPS-546, included
9 within Staff's Exhibit __ (SCSP-1), supports its concern, the SCSP does
10 not specifically state, and it is not clear to the Company how exactly the
11 response to DPS-546 is supportive. Additionally, the question asked, and
12 the response provided in DPS-546 does not relate to customer education
13 associated with the monthly meter reading plan. Therefore, SCSP's
14 justification lacks factual and evidentiary support, and the Commission
15 should reject this rationale as a basis for not allowing the Company to
16 recover the cost for the rollout of monthly meter reading.

17 Q. Has the Company developed a robust customer education and information
18 campaign to communicate the implementation of monthly meter reading?

19 A. Yes, Central Hudson has created a robust customer education and
20 information campaign to communicate the implementation of monthly
21 meter reading, as shown in Exhibit __ (CEP-11R). This includes direct
22 customer communications, including emails and print newsletters and

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1 direct mail, along with social media, digital communications, and paid
2 advertising across multiple formats.

3 Q. Please address the SCSP's concerns with the cost estimates and
4 supporting analysis provided by the Company, including the potential for
5 operational efficiencies, and additional internal FTEs and contracted
6 resources.

7 A. The Company filed its monthly meter reading plan in Case 22-M-0645
8 which fully lays out the timeline and the incremental costs and resources
9 required for the transition to monthly billing. Many stakeholders have
10 asked the Company to expedite the rollout of monthly meter reading to
11 reduce the number of estimated bills. The Company has already begun
12 the phased rollout of this plan and has incurred expenses that it has not
13 asked for recovery of within this proceeding. Although the SCSP states
14 that operational efficiencies may exist, they provide no evidence or
15 support for a specific level of operational efficiencies. In fact, the
16 Company's meter reading routes are currently designed and optimized
17 based on geographical area. In the future, the Company may investigate
18 rerouting to determine if efficiencies can be found, however rerouting is a
19 multi-year project and waiting to rollout monthly meter reading to do so

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1 would conflict with the stakeholder demands to implement monthly meter
2 reading in the near term.

3 Q. Did the SCSP raise concerns with the use of Precision Pipeline Solutions
4 (“PPS”) for a portion of monthly meter reading?

5 A. Yes, SCSP’s concerns with PPS relate to the lack of a new request for
6 proposals (“RFP”).

7 Q. Why has the Company not engaged with a different vendor than PPS
8 since prior to 2011 or released a new RFP since that time?

9 A. Presently there are no meter reading companies located within our service
10 area other than PPS. A new vendor would need to establish a business
11 facility within the service territory as well as hire an entire workforce of
12 management, trainers, and reading staff. Significant capital investment in
13 vehicles would also be required of a new vendor attempting to establish a
14 presence in the Hudson Valley area.

15 Q. Are there additional reasons to continue to utilize PPS as the meter
16 reading vendor contractor?

17 A. Yes, most of the PPS meter reading employees are also our customers.
18 They work and live in our service area and therefore have a greater
19 connection and concern for the area and our customer base. A majority of
20 the team leads within the meter reading workforce have more than five
21 years’ experience and they are familiar with our procedures and routes.

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1 Q. Did the SCSP discuss concerns regarding the Company's inclusion of
2 electric vehicles within the monthly meter reading plan?

3 A. Yes, the SCSP states that the Company's electric vehicle proposal for
4 meter reading is concerning, as that component of the plan is not
5 supported by cost savings but rather is being proposed to be in alignment
6 with the CLCPA. The Panel is puzzled by SCSP's reaction to this
7 component of the plan as New York State's electric vehicle goals are well
8 known and the relatively higher purchase cost of an electric vehicle is also
9 well known. Moreover, the planned purchase of electric vehicles is only
10 one component of the plan and does not provide justification for removal
11 of all costs associated with the monthly meter reading rollout.

12 Q. Please summarize the Panel's view of the SCSP's objections to allowing
13 recovery of the costs associated with the implementation of monthly meter
14 reading.

15 A. The SCSP's justification for removing the costs of the ongoing rollout of
16 monthly meter reading is flawed and lacks factual and evidentiary support.
17 The Commission therefore should reject SCSP's proposed disallowance
18 of these costs and all associated incremental FTEs and contracted
19 resources associated therewith.

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Q. Please state Central Hudson's residential and non-residential customer arrears balances greater than 60 days as of November 30, 2023.

A. Residential and non-residential arrears greater than 60 days as of November 30, 2023, total \$116.1 million and \$30.6 million, respectively, associated with 65,665 residential and 10,638 non-residential customers.

Q. Is it necessary that Central Hudson fully restart collections activities during the Rate Year?

A. Yes. Customer arrears balances have grown significantly since the Company suspended collections activity for all customers in March of 2020. Some form of suspension of collection activities continued until mid-2023 in light of the COVID-19 Pandemic, the Parker-Mosley Act of 2020, the Parker-Richardson Act of 2021, and collection limitations included within the Arrears Relief Programs. While these influences were impactful, other stakeholders (see Exhibit __ (CEP-1R) at pages 5-6) were also communicating to the Company's customers and impacting the loss of customer trust associated with the SAP-CIS transition. Additionally, the Company has not yet automated collections processes within the SAP-CIS and until that step is complete, it must rely on manual collections efforts. All of these factors have impacted customer arrears growth; however, regardless of the impact of any one driver it is imperative that the Company begin collections efforts.

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1 Q. What steps is Central Hudson currently taking to mitigate the impact of
2 residential collections?

3 A. Central Hudson is pursuing soft collections of residential arrears via
4 phone, letter and e-mail campaigns, is working with county assistance
5 agencies to promote the HEAP and EAP programs, and providing the
6 notifications required for residential customers to secure emergency
7 HEAP benefits. These processes are now running in an automated
8 fashion within the SAP-CIS.

9 Q. Have the SCSP or other parties commented on Central Hudson's plan to
10 resume collections?

11 A. Yes, SCSP stated that they are concerned with the Company's level of
12 residential customers in arrears in conjunction with the Company's lack of
13 a plan regarding restarting the collections processes and associated
14 service terminations.

15 Q. Does the Company have a plan to fully restart its collections processes?

16 A. Yes. The Company has begun a very measured approach to restarting
17 collections activities including soft collections for residential customers and
18 beginning manual collections for commercial customers. The Company is
19 also planning a phased rollout of collections activities and service
20 terminations in conjunction with its Monthly Meter Reading initiative in
21 2024. The coordination with Monthly Meter Reading is meant to minimize
22 customer concerns about receiving collections contacts on bills not

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1 calculated from an actual meter reading. Central Hudson will resume
2 residential collections with a manual approach that will start with a small
3 group of customers, include a period of customer account validation for
4 quality and accuracy, and then scale to all customers. The timeline for
5 this plan is laid out within Exhibit __ (CEP-12R) and the required contact
6 center resources are laid out within Exhibit __ (CEP-13R). When Dunning
7 goes live, collections will be monitored through controlled resumption
8 activities to pre-pandemic levels of activity over a multi-month period.

9 Q. Please describe the process that the Company will undertake to validate
10 customer accounts for quality and accuracy.

11 A. The Company will review accounts individually and determine if they have
12 open billing-related BPEMs or activity records indicating that the account
13 is under review for a billing complaint or other issue. The Company will
14 also review the billing history and confirm that the account is billed to
15 current. The Company will further review if the account has had
16 significant cancel rebill activity and if so, will delay issuing a termination
17 notice. Finally, the Company will only send the Final Termination Notice
18 ("FTN") on months where the customer has an actual read. The team will
19 review if the customer has received excess consecutive estimates and will

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1 delay the FTN unless these estimates are related to a previously
2 communicated access issue.

3 Q. Why is Central Hudson taking this approach?

4 A. The Company is taking this approach to restore customer trust while it
5 begins to reduce arrears balances for the benefit of all customers.

6 Q. Is Central Hudson taking other steps to restore trust and credibility now?

7 A. Yes. The Company has engaged in extensive outreach to its customers
8 to answer questions about bills, provide reconciled bills and work through
9 customer inquiries face-to-face in a series of open houses throughout its
10 service territory. Since December 2022, Central Hudson has conducted
11 nine Open House events, 11 events held jointly with elected officials, and
12 participated in many other forums to meet with customers in-person and
13 address questions about their bills. More than 100,000 customers have
14 been invited and hundreds of customers have been assisted at these
15 events. Moreover, Central Hudson has communicated with customers
16 through social media and paid advertising, including television and
17 streaming ads, about its efforts to add customer-facing personnel to better
18 assist customers and its plans to transition to monthly meter reading. This
19 campaign is aimed at increasing credibility and restoring customer trust.

20 Q. Is Central Hudson currently performing manual collections?

21 A. Yes, Central Hudson began issuing manual FTNs to customers in April
22 2023 in accordance with applicable non-residential regulations.

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1 Q. Please describe the results of manual collections effort for non-residential
2 customers.

3 A. As of November 30, 2023, 10,638 non-residential customers were in
4 arrears with a total arrears balance of \$30.6 million. Through November
5 30, 2023, 997 FTNs have been issued for Manual Non-Residential
6 Collections for a potential recovery of \$12.5 million. One hundred and
7 fifty-seven customers have paid in full, and 483 customers have entered
8 Deferred Payment Agreements ("DPAs"). The average term for DPAs is 7
9 months. Thirty-nine shutoffs have been completed to date, and the
10 majority of these customers remain locked as many of the commercial
11 premises were vacant. Nearly \$5.1 million has been collected through full
12 payments and DPA down payments.

13 Q. What lessons has Central Hudson learned from its non-residential
14 customers manual collections efforts?

15 A. Key, transferrable lessons learned are described below:

- 16 1. A dedicated phone line staffed with an appropriately sized dedicated
17 team of experienced representatives has been vital to the success of
18 the program.
- 19 2. Having multiple points of contact with the customer helped prevent
20 customer escalations, helped prevent confusion about the balance
21 owed, and helped prevent service interruptions.

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- 1 3. A widespread training effort was required to kick off the project; and
2 continued trainings and touch points were necessary to reinforce the
3 most important pillars of the program, such as ensuring DPAs are
4 consistent for all customers.
- 5 4. This program has also proven that non-residential businesses in the
6 service territory are able to pay their Central Hudson bill and/or provide
7 for the payment of a bill through a DPA. The Company has sent over
8 1,000 FTNs for high balance accounts, only 40 accounts have been
9 locked, the majority of these being vacant buildings. These customers
10 have been able to pay off 30%-50% of their high balance arrears
11 before service was interrupted.
- 12 Q. How will these lessons be applied to residential collections efforts?
- 13 A. The Company will maintain a dedicated phone line for customers that
14 receive an FTN. This has greatly increased customer satisfaction during
15 the non-residential collections interaction, which is critical. In addition, the
16 Company will apply the following lessons learned:
- 17 1. The team is investigating and will implement methods to review and
18 validate account billing is correct on a more widespread basis, so that
19 collections can be scaled carefully and with integrity for residential
20 customers that will be at risk of shutoff.
- 21 2. The Company is staffing a dedicated collections team to manage
22 residential collections.

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1 3. A comprehensive training plan has been created to teach the entire
2 contact center as well as any employee that may be a part of the
3 collections process how residential manual locking will need to be
4 handled in accordance with HEFPA.

5 Q. What is Central Hudson's conclusion about the overall effectiveness of
6 this program?

7 A. Central Hudson concludes that this program has been effective and is
8 ready to be scaled using a measured approach. The Company is intent
9 on going forward with its residential manual locking program based on the
10 above lessons learned and its planned measured approach to begin
11 issuing manual residential FTNs, in accordance with the HEFPA
12 regulations, beginning on April 15, 2024.

13 Q. What steps will the Company take to ensure that collections actions for
14 residential customers are taken in accordance with HEFPA?

15 A. The Company has developed its initial standard operating procedure in
16 conjunction with a skilled third-party training consultant and instructional
17 designer and it will be closely monitored by management to ensure
18 consistency and compliance.

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1 Q. For how long will manual residential and non-residential locking efforts
2 continue?

3 A. These efforts will continue in 2024, with a dedicated team of Central
4 Hudson employees supporting them, until automated Dunning functionality
5 is deployed in SAP-CIS at the end of August.

6 Q. How will the Company ensure that the collections program is effective and
7 that feedback loops are incorporated?

8 A. The Company will establish a dedicated team to support the collections
9 program. This team will establish metrics which will include performance
10 targets, EAP and HEAP enrollment targets, and account quality standards.
11 Customer satisfaction will also be monitored. This team will review
12 progress regularly and will incorporate lessons learned (from customers
13 and employees) throughout the execution of the program.

14 Q. How is the Company planning to communicate the collections program to
15 residential and non-residential customers?

16 A. The Company has been executing its collections program communications
17 since August 2022 and communications are ongoing. Central Hudson
18 provides information to its employees, customers and stakeholders about
19 the Dunning restoration process for all customers (system-generated), and
20 the separate programs for locking unpaid commercial accounts
21 (manual/out-of-system). Our communications emphasize the timelines of
22 the resumption of these processes. This outreach began in 2022 and

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1 continued into this year. Some communications are targeted, as
2 applicable; while other communications will be issued to a broader
3 audience. The purpose of these communications is to alert all
4 stakeholders with regard to the resumption of the Company's formal
5 collections processes, which had been suspended since early 2020.
6 Central Hudson has been sending targeted reminders (letters, emails, text
7 messages, outbound phone calls, in-person field visits) to customers with
8 an AR balance since August 2022. These communications alert the non-
9 payers that terminations are coming but do not provide a specific date
10 currently. We plan to add the date/timing of April 2024 to residential
11 collections communications over the next several weeks.

12 Q. Did the SCSP comment on the resources required to implement
13 residential collections?

14 A. Yes, the SCSP stated that the Company did not provide a detailed plan
15 and a firm timeline for beginning service terminations and other collections
16 activity for residential customers and, therefore, SCSP could not evaluate
17 the level of staffing that would be appropriate for such an initiative. The
18 SCSP then proposed the removal of all Company proposed internal FTEs
19 and external call center resources required to support the Company's
20 collections efforts.

21 Q. Does the Company agree with SCSP's concerns regarding staffing?

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1 A. No, within the Panel's direct testimony and exhibits, the Company's future
2 collection activities were aligned with the requested necessary internal
3 FTEs and external call center resources.

4 Q. Has the Company's need for the requested resources changed?

5 A. No. All incremental positions requested in the Panel's direct testimony
6 are still required to perform key initiatives and meet targeted levels of
7 customer service performance. Furthermore, please see Exhibit ____
8 (CEP-13R) for a summary of the need for the addition of 33 incremental
9 Customer Service Representatives in the Rate Year, which was also
10 described in Exhibit __ (CEP-4) of the Panel's direct testimony. Exhibit __
11 (CEP-13R) also provides an overview of how these contact center
12 resources will be utilized to support the collections program and achieve
13 customer service performance targets. This exhibit shows the collections
14 team beginning to scale in January and then grow to full complement in
15 May 2024. This will allow sufficient time for the team to be trained first on
16 manual residential locking procedures, following the winter rules period,
17 and then on SAP-CIS Dunning functionality, prior to the August 31, 2024
18 cutover, when the fully dedicated team needs to be in place to interact
19 with customers.

20 Q. Does the Company agree with SCSP's proposed exclusion of \$1.6 million
21 for call volume overflow costs as noted on page 88 of the SCSP testimony?

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1 A. No. As described in the Company's direct testimony, these costs are
2 necessary to support overall contact center operations and the controlled
3 resumption of collections as call volume and average handle times for
4 these collections contacts are expected to increase significantly. This
5 expenditure is required to achieve targeted levels of customer service
6 performance to all customers.

7 Q. Did the SCSP make any recommendations regarding tracking customer
8 inquiries made directly to the Company regarding collections?

9 A. Yes, the SCSP recommended that the Company begin to track and report
10 any customer inquiries made directly to the Company regarding
11 collections, including late payment fees, final termination notices, or
12 employee treatment of a customer.

13 Q. Does the Company agree with the SCSP's recommendation?

14 A. Yes, these complaints and inquiries will be tracked in an automated
15 fashion through the Company's live contact channels, and manually for
16 PSC Complaints and external stakeholder inquiries.

17 Q. What does the Company propose regarding SCSP's request to require the
18 Company to provide weekly status updates of its collections to OCS Staff
19 and other interested parties?

20 A. The Company does not believe that weekly status updates are required or
21 productive but agrees that reporting on a regular cadence is important and

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1 should be milestone based, in alignment with the key milestones of the
2 collections program as noted in Exhibit __ (CEP-12R).

3 Q. Does the Panel agree with the SCSP's recommendation that Central
4 Hudson implement a simple bill calculator on its website to allow
5 customers to ensure bill accuracy?

6 A. No. In general, simple bills can be recalculated by customers using the
7 usage noted on their bills and relatively straight forward math. However, a
8 one-size-fits-all simple calculator is not possible due to the diversity of
9 billing situations and complex billing structures available to residential
10 customers. Therefore, a simple bill calculator is likely to cause additional
11 customer confusion since customers are not generally aware of the
12 diversity of billing situations and which one specifically applies to their
13 account.

14 **VIII. EXTREME HEAT PROTECTIONS**

15 Q. Do any parties discuss the suspension of service terminations during
16 periods of extreme heat?

17 A. Yes. PULP Witness Yates's testimony introduces the concept of
18 suspension of service terminations during periods of 90 degree weather
19 and proposes additional protections for customers residing within a "Heat
20 Island" at temperatures of 85 degrees.

21 Q. Does the Company agree with Mr. Yates' recommendations?

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1 A. No, the Company is not able to ascertain any scientific basis for lowering
2 the Company's threshold for protection from service termination from 93 to
3 90 degrees or 85 degrees within more densely populated areas. In
4 addition, the Company's existing temperature threshold also factors in the
5 heat index, so it is highly likely that terminations will be suspended during
6 heat events where the surface temperature is below 93 degrees. Existing
7 protections represent a balanced approach to collection which protects
8 vulnerable customers but mitigates uncollectible expense burdens for all
9 customers.

IX. STAFFING AND COMPLEX BILLING

11 Q. Did the SCSP propose any reductions to the Company's proposed staffing
12 for its billing function?

13 A. Yes, the SCSP proposed the disallowance of one Customer Billing
14 Technician and two Customer Support Assistants within the Customer
15 Billing organization.

16 Q. What does the SCSP state as the reason for its disallowance of these
17 resources?

18 A. The SCSP cites the completion of CDG net credit billing automation and
19 associated efficiencies as a reason to disallow the Customer Billing
20 resources described in the direct testimony and exhibits of this Panel.

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1 Q. Is the SCSP's rationale accurate?

2 A. No, and as a result its proposal to disallow the Company's proposed
3 Customer Billing resources should be rejected. Although it is reasonable
4 to expect that some efficiencies will be gained through complete
5 automation of CDG and net credit billing, as stated earlier in the Panel's
6 testimony, new CDG billing requirements are likely in the near future and
7 will continue to evolve. Additionally, the Customer Billing department is
8 responsible for other significant and high priority work efforts that require
9 incremental staffing. Customer Billing resources are needed to support
10 manual processes, testing, and maintenance associated with new
11 mandated complex billing structures on an ongoing basis. As an example,
12 new complex billing requirements were established within the
13 Commission's October 13, 2023, Order Establishing Updated Standby
14 Service Rates and Implementing Optional Mass Market Demand Rates
15 ("Standby Order") within Case 15-E-0751. The Standby Order requires
16 the Company to establish new Standby rate structures for customers
17 required to be on Standby/Buyback rates by January 2024, and for
18 customers opting-in to Standby/Buyback rates, by July 1, 2024. The
19 automation of this rate structure is particularly significant in that customers
20 of many different service classes are eligible to participate, and processes
21 must be set up to account for a variety of customer types. Additionally, as
22 described in the direct testimony of this Panel, the Customer Billing

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1 organization is tasked with processing billing exception managements,
2 responding to customer inquiries related to billing, and testing system
3 changes related to billing. These tasks will not go away with the advent of
4 CDG billing automation and may increase as additional billing complexity
5 is mandated.

6 Q. Did any other Parties discuss electric utility billing complexity?

7 A. Yes, Dutchess County Witness Page states that “Electric billing in New
8 York is probably some of the most complicated regulated electric utility
9 billing in the United States.”

10 Q. Does the Panel agree with Mr. Page’s statement?

11 A. The Panel has not performed an independent analysis of Mr. Page’s
12 claim, but Mr. Page’s claim appears reasonable. Mr. Page further
13 discusses how the complexity of electric billing has been compounded by
14 Commission Orders layering in changes to customer billing that must
15 conform to not easily understood tariff language. The Panel agrees with
16 the overall concept of Mr. Page’s statements and agrees that further billing
17 complexity is inevitable as future Commission Orders mandate billing
18 changes to increase the adoption of distributed energy resources or other
19 state policy goals.

20 **X. PROPOSED CHANGES TO CAPITAL PROGRAM**

21 Q. Did the SCSP propose elimination of technology projects that will support
22 achievement of targeted levels of customer service performance?

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1 A. Yes, the SCSP proposed removing the following Customer Experience
2 technology projects: IVR Modernization, Mobile App Enhancements,
3 Website Enhancements, Bill Experience Improvements and Payment
4 Experience Improvements.

5 Q. Does the Panel agree with the SCSP recommendation for the removal of
6 these technology projects?

7 A. No. The Panel does not agree with disallowing funding for these
8 Customer Experience projects during the Rate Year. These investments
9 are focused on meeting our customers' digital expectations, which are an
10 important component of helping to restore customer trust and meeting
11 customer service performance targets.

12 Q. Please describe the SCSP's rationale for removing the IVR Modernization
13 project.

14 A. The SCSP indicates the Panel did not identify any risks associated with
15 outages or service interruptions if the current IVR is left in place.

16 Q. How does the Panel respond?

17 A. First, it is important to recognize that the manufacturer is requiring a
18 technical upgrade to the current IVR software in order for it to remain
19 supported by the vendor. This technical upgrade must be performed to
20 prevent both cybersecurity and functional risk to the organization.

21 Second, the objectives of the IVR Modernization project are to upgrade
22 our current IVR Platform from an on-premises solution to a cloud-based

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1 solution with disaster recovery capabilities, the ability to easily develop
2 new flows with a web-based drag and drop configuration tool, and a test
3 environment without the need of a third-party vendor. The new IVR would
4 also provide enhanced reporting capabilities including more detailed data
5 related to abandonment.

6 Q. Please describe the SCSP's rationale for removing the Mobile App and
7 Website project.

8 A. The SCSP stated that the project was premature and that the Company
9 has not issued an RFP or evaluated an outside vendor for completion of
10 the project. Additionally, the SCSP raised a concern that the Company
11 had not performed a cost benefit analysis.

12 Q. Does the Panel agree with these objections?

13 A. No, the SCSP's logic is flawed and should not be accepted. First, a
14 request for proposal and external vendor quotes are not required for this
15 project as the Mobile App and Website enhancements are completed by
16 internal resources. Secondly, regarding the lack of a cost benefit analysis,
17 the provision of a user experience that is commonplace throughout many
18 industries is generally seen as a cost of doing business and the relatively
19 minimal customer costs associated with this project are generally not
20 measured against the extremely difficult to quantify value of providing
21 expected customer experiences.

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1 Q. Please describe the SCSP's objection to the Company's proposed bill
2 redesign effort.

3 A. SCSP indicates its concern that a bill redesign effort would create
4 additional customer confusion and frustration.

5 Q. Does the Panel agree with this statement?

6 A. No. The main objective of working with our vendor to perform a bill
7 redesign would be to improve clarity, reduce any customer confusion or
8 frustration, limit calls to the contact center, and better align with bill
9 presentment of other New York State utilities.

10 Q. Did the SCSP have concerns regarding the Company's proposed
11 Payment Enhancement project?

12 A. Yes, the SCSP asserts that inconsistent costs, lack of a detailed timeline,
13 and the fact that the initial proposal of the project would interact with the
14 Company's legacy CIS as reasons for denial of the project.

15 Q. Does the Company agree with this rationale?

16 A. No. The project was originally planned to be implemented prior to the
17 SAP-CIS transition, which is why the original Project Intake form
18 mentioned the Legacy CIS. Due to conflicts with resources working on the
19 transition to the SAP-CIS, the project was not able to be completed in
20 2021, which is the basis for changed cost estimates and timelines. Now,
21 post SAP-CIS implementation, the project would only interact with SAP-

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1 CIS. As such the SCSP's rationale for denial of this project should be
2 rejected.

3 Q. Did the SCSP discuss the Spanish Bills Translations project?

4 A. Yes, the SCSP stated that "Considering that these services were reflected
5 in the 2021 Rate Order, we recommend that the costs to implement the
6 translation of multilanguage bills, forms, and letters should not be the
7 responsibility of ratepayers in these cases and that they are borne by the
8 Company's shareholders, as the Company is not in compliance with the
9 2021 Rate Order."

10 Q. Does the Company agree with the removal of cost recovery for this
11 project?

12 A. No. First, it should be noted that the Company completed all but one of
13 the Spanish translation projects listed within Appendix Z of the 2021 Rate
14 Order in Cases 20-E-0428 and 20-G-0429 ("Appendix Z"). However, the
15 Spanish Customer Bills translation included two target dates within
16 Appendix Z, these targeted dates corresponded with the "Evaluation" and
17 then "Launch" of the project. It was known that the Company had not
18 completed this evaluation at the time of the Joint Proposal or subsequent
19 Rate Order due the inclusion of the evaluation milestone. However, as a
20 result of the evaluation, the launch was deemed to be infeasible based on
21 the scope of the project and conflicts with the SAP-CIS that would not be
22 resolved prior to the proposed launch target date. This means that the

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1 costs of the project were not included in the Company's Net Plant and
2 therefore are not currently being recovered by customers. Finally, it is
3 important to note that the Joint Proposal in Cases 20-E-0428 and 20-G-
4 0429 states "Unless expressly stated in this JP, nothing in this JP is
5 intended to alter the Company's flexibility during the term hereof, to alter
6 the timing of, substitute, change, or modify its capital projects." Thus, just
7 because a project was approved in the last Joint Proposal does not mean
8 the timing cannot be pushed forward and approved in a subsequent rate
9 case. As such, there is no basis for pre-emptively removing cost recovery
10 for this project, and the Panel strongly opposes the SCSP's
11 recommendation.

XI. CONSUMER OUTREACH / ENERGY AFFORDABILITY PROGRAM

12 Q. Did SCSP propose any disallowance of the Company's proposed staffing
13 related to Consumer Outreach?
14

15 A. Yes. SCSP disagreed with the addition of an "additional" Consumer
16 Outreach Director. However, the Panel notes that the Company currently
17 does not have a Consumer Outreach Director. SCSP also disagreed with
18 the addition of a Consumer Outreach Supervisor.

19 Q. Does the Company agree with the SCSP's removal of these two
20 positions?

21 A. No, Consumer Outreach currently has one Supervisor and seven
22 Consumer Outreach Representatives. The Company is not proposing

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1 adding “another Consumer Outreach Director,” instead the proposed
2 organizational structure is to have one Director, two Supervisors and nine
3 Outreach Representatives. Additionally, Central Hudson currently utilizes
4 five external contractors to assist with PSC and elected official complaint
5 responses. Therefore, the two supervisors are meant to manage 14
6 internal and external FTEs, which is a reasonable supervisor to
7 subordinate ratio. Finally, the proposed Director of Consumer Outreach
8 will provide direction and leadership to the group and ensure that analysis
9 and reporting requirements are met.

10 Q. Did SCSP or any other interveners comment on the current Energy
11 Affordability Program (“EAP”)?

12 A. Yes. Please see the Forecasting and Rates Panel rebuttal testimony for
13 the Company’s responses related to the EAP program.

XII. ECONOMIC DEVELOPMENT

15 Q. SCSP recommends that economic development funding for gas be
16 eliminated during the Rate Year, resulting in a Rate Year allowance of
17 \$0.8 million for electric and \$0.00 for gas, and that the Company modify
18 each existing program to eliminate reference to offsetting the cost of

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1 natural gas infrastructure or equipment. Does the Company agree with
2 this recommendation?

3 A. No, these costs are spread based on the common allocation since the
4 benefits of economic development accrue to all Central Hudson
5 customers.

6 Q. SCSP recommends that the Commission require the Company to modify
7 its current method of tracking created jobs and retained jobs for every
8 approved application. Does the Panel agree with this recommendation?

9 A. No. Tracking created jobs or retained jobs beyond what the Company
10 currently does would be a notable incremental addition of work scope with
11 little to no added benefit.

12 Q. Please explain the Company's current process for job tracking and any
13 benefit or challenges to modifying its program.

14 A. The Company's economic development programs do not require or call for
15 the ongoing tracking of created or retained jobs, beyond taking a snapshot
16 of employment levels when an application is filed or a project initiated
17 through the presentation of the applicant's NYS-45 that details employees
18 at a given time, and then comparing that NYS-45 to the figure after the
19 applicant meets its hiring objective and requests disbursement of funds.
20 Currently, economic development program requirements call for "a
21 minimum of 20 full time equivalent jobs must be retained or created." This
22 requires Company personnel to review an economic development

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1 application and a subsequent review of required documents that
2 demonstrate the hiring requirement has been accomplished by the
3 applicant. Once the employment requirement, along with other
4 requirements is met, then funding can be released to the applicant.
5 Additionally, Central Hudson requires applicants to have participation from
6 Empire State Development Corporation ("ESD"), a local industrial
7 development agency, a community college, or a local development
8 corporation. If any application does not contain participation from the
9 above-mentioned entities, Central Hudson may consider a letter of support
10 from the county of origin for such projects on a case-by-case basis. ESD
11 and/or other governmental bodies have the expertise and capability to
12 monitor performance and adherence by applicants to any state or county
13 required employment commitments. Therefore, tracking created jobs or
14 retained jobs beyond what the Company currently does would be a
15 notable incremental addition of work scope with little to no added benefit.

16 Q. The SCSP recommends outreach efforts associated with Geothermal and
17 Heat Pump Programs be included in the Economic Development Annual
18 Report. Would including this information in the annual Economic
19 Development Report increase workload with no added benefit?

20 A. Yes, as this information is already submitted to the PSC in other reports.
21 Pursuant to the Commission's January 16, 2020 Order Authorizing Utility
22 Energy Efficiency and Building Electrification Portfolios Through 2025,

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1 issued in Case 18-M-0084, electric utilities are directed to file a Statewide
2 Heat Pump Implementation Plan and Clean Heat Program Reports
3 annually. These reports serve as the primary filing requirement for the
4 NYS Clean Heat program. The Company's outreach efforts are
5 specifically addressed in its Marketing and Outreach section of the
6 Statewide Heat Pump Implementation Plan. Additionally, the New York
7 State Clean Heat Program Annual Reports include further details on
8 Marketing and Outreach efforts for the reported year along with additional
9 forward-looking initiatives. Annual filings of these reports can be found
10 under Case 18-M-0084. The Company also reports on NYS Clean Heat in
11 general via the Outreach and Education Plan submitted on April 1, 2023.
12 Since Geothermal and Heat Pump pilot programs are already reported in
13 various other submissions, it would be redundant to add this information to
14 the annual Economic Development report.

15 Q. The SCSP proposes to allow the Company to evaluate and make minor
16 changes to grant programs on an as-needed basis annually through a
17 request included in the annual Economic Development report. Would it be
18 beneficial to streamline the process for adjusting economic development
19 programs?

20 A. We agree that enabling a process to make minor changes via the annual
21 Economic Development report represents a process improvement.

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1 Q. Does this conclude your rebuttal testimony at this time?

2 A. Yes, it does.

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2 MR. FITZGERALD: And Your Honor, I'll
3 note that the exhibits for this panel were previously
4 marked and are in the record. And with that, the
5 customer experience panel as seated today is
6 available for cross-examination.

7 A.L.J. COSTELLO: Okay. Thank you.
8 We're starting with Department of Public Service
9 Staff.

10 MR. COYNE: Thank you, Your Honor.

11 CROSS-EXAMINATION

12 BY MR. COYNE:

13 Q. And good morning panel. My name
14 is Ryan Coyne, I'm a lawyer for the Department of
15 Public Service, and I have a couple of questions
16 about your testimony today. I'd like to start with
17 your initial testimony, if we could. Page nine, line
18 seven. I'll give you a minute to get there. And so
19 at this portion of your testimony, the panel
20 discusses issues associated with the company's SAP
21 CIS launch. Is that correct?

22 A. (Campagiorni) Yes.

23 Q. When did the company first become
24 aware of those issues?

25 A. I would say the company first

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 started becoming aware of those issue -- issues
3 shortly after September 1st. I don't have an exact
4 date, but as bills began generating on the cycles, we
5 started to notice some -- some issues.

6 Q. So roughly September, 2021,
7 somewhere in that timeframe?

8 A. Probably by October.

9 Q. Okay. All right. Would it be
10 fair to say that once the company became aware of
11 those issues, it immediately recognized the need to -
12 - to remedy them?

13 A. Yes.

14 Q. And would it also be fair to say
15 that the company immediately began taking steps to
16 address them?

17 A. Correct.

18 Q. It's your initial testimony --
19 we're still on page nine, but further down lines 22
20 and 23 and continuing onto the top of page 10, the
21 panel identifies what it refers to as I believe it's
22 referred to as the dashboard metrics, but they are
23 six key customer service metrics that the company has
24 been following since the -- the launch of the system.
25 Is that right?

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2 A. That's correct.

3 Q. And it was your testimony that as
4 of July, 2023, the company was achieving close to at
5 or above pre SAP CIS launch performance levels on
6 these dashboard metrics, is that right?

7 A. That is correct.

8 Q. Is that still the case today?

9 A. Yes.

10 Q. In light of all this, would it be
11 fair to say that the company's overall customer
12 service performance has now returned to pre SAP CIS
13 launch levels?

14 A. I would say not in all those
15 measures, but in some of those measures, yes, we have
16 returned to those levels of performance that we would
17 expect.

18 Q. Okay. And -- and which measures
19 are -- are not quite back to those baseline levels?

20 A. I would say the -- the service
21 level on the calls is a little bit below the target
22 of 67.

23 Q. Okay. And elsewhere in your
24 testimony you say that you believe that you're on
25 track to return to baseline levels by at least the

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 beginning of the rate year in July, 2024. Do I have
3 that right?

4 A. Can you just repeat the question
5 please?

6 Q. Sure. Elsewhere in your
7 testimony I believe that you say that the company's
8 on track to return to baseline levels by the
9 beginning of the rate year or July, 2024. Is that
10 accurate?

11 A. Do you have a page reference?

12 Q. Sure. Yeah. So I'm looking at
13 page 11 of the initial testimony.

14 A. Yes.

15 Q. Yes. Lines 13 through -- for the
16 record lines 13 through 17, the company is -- expects
17 to return to or exceed baseline performance levels
18 for each of -- each of these metrics.

19 A. Yes.

20 Q. Okay. I'd like to turn to your
21 rebuttal testimony now if we could, at page 12. So
22 line six to seven of page 12, the panel testifies
23 that it is important to understand the tone of
24 customer comments. Do you see that quote there?

25 A. Can you -- can you reference the

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 line again? I'm not sure.

3 Q. Page 12 of the rebuttal
4 testimony. And I -- I will note for the record, this
5 is the corrected rebuttal testimony that was filed in
6 January. But at page 12, line six and seven of the
7 corrected rebuttal testimony.

8 A. Yeah. I see -- I see that in the
9 record.

10 Q. Okay. At the beginning at line
11 11, the panel begins to describe an analysis of the
12 comments that were made at the in-person public
13 statement hearings in this rate case. Is that
14 correct?

15 A. Correct.

16 Q. So is it fair then to say that
17 the panel considered the public comments that were
18 made at the public statement hearings while
19 developing its recommendations for this rate case?

20 MR. FITZGERALD: Your Honor, I'm going
21 to object to that just to the extent that if there
22 were public statement hearings that occurred after
23 the development of their testimony just to be -- for
24 clarification on the record.

25 A.L.J. COSTELLO: These -- these refer

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 to the in-person public statement hearings held in
3 Poughkeepsie, Newburgh, Kingston, and Catskill, which
4 I believe were the last public statement hearings
5 that were held. And I'm referring to lines 11
6 through 13 of that page.

7 MR. COYNE: Thank you, Your Honor, for
8 the clarification.

9 MR. CAMPAGIORNI: Can you repeat your
10 question please?

11 BY MR. COYNE: (Cont'g.)

12 Q. Sure. Based on the analysis that
13 the panel has attached to its rebuttal testimony of
14 the comments made at these public statement hearings,
15 would it be fair to say that the panel considered
16 those public comments while developing its
17 recommendations, and I'll be more specific, it's
18 rebuttal testimony for this case?

19 A. We did analyze the comments and
20 took those into consideration.

21 Q. Okay. And would the panel agree
22 that the comments offered by customers at the public
23 statement hearings are one means by which the company
24 can better understand its customer's concerns?

25 A. I think that would be fair.

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2 Q. I'd like to turn back to the
3 initial testimony, if you don't mind, page 27. So at
4 page 27 of the panel's initial testimony at lines
5 three and four, the panel proposes to exclude PSC
6 complaints that are associated with commodity prices
7 from the company's PSC complaint rate customer
8 service performance indicator or CSPI. Is that
9 correct?

10 A. That is correct.

11 Q. The panel agree that in order to
12 successfully implement this recommendation, the
13 company must be able to accurately identify track and
14 report on commodity price related PSC complaints?

15 A. Yes.

16 Q. Okay. Then a little bit further
17 down the page at lines 12 to 14, the panel asserts
18 that removing commodity price related complaints
19 would increase alignment across the state because
20 this exclusion was included in a recent Con Edison
21 joint proposal. Is that right?

22 A. Yes.

23 Q. Okay. And would the panel then
24 agree that this comparison to Con Edison's joint
25 proposal is only valid if Central Hudson's ability to

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 differentiate between commodity price related
3 complaints and other complaints is comparable to that
4 of Con Edison?

5 A. I -- I would say we agree we need
6 a methodology to do that. I'm not specifically aware
7 of exactly how ConEd does that.

8 Q. Okay. And so -- all right. So -
9 - and so to be clear then the panel is not familiar
10 with Con Edison's manner for tracking these types of
11 complaints then.

12 A. That's a fair statement.

13 Q. Okay. I am sorry to keep bouncing
14 around here, but if we could go back to your rebuttal
15 testimony, page 14, please. Okay. So at page 14 of
16 your rebuttal testimony at lines 14 to 16, the panel
17 testified that the category identified as pricing-
18 bill is correct, indicates complaints where the
19 company has identified commodity pricing as the root
20 cause of a PSE complaint. Is that correct?

21 A. (Kopp) Yes, that's correct.

22 Q. For how long has the company used
23 this category to track its PSE complaints?

24 A. We began in January of 2023.

25 Q. Okay. Could the panel please

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 explain under what circumstances a complaint may be
3 classified as pricing bill is correct?

4 A. Sure. If a complaint is received
5 regarding a high bill, we will look to verify that
6 actual meter reads have been done consistently, then
7 we'll compare the usage to the prior billing period
8 to the prior year. If the usage is consistent or
9 less than the prior year and it's just the pricing is
10 higher, then we'd categorize -- categorize it as a
11 supply price complaint.

12 Q. Okay. And based on that
13 explanation, would it be fair to say that the
14 company's ability to accurately classify a complaint
15 as pricing bill is correct, is dependent upon
16 accurate results from its SAP CIS system?

17 A. (Campagiorni) Yes.

18 Q. Okay. So continued issues with
19 the SAP CIS system would undermine the company's
20 ability to accurately track these types of
21 complaints. Is that fair to say?

22 A. I would say not necessarily.

23 Q. Could you elaborate, please?

24 A. There's -- there may be some
25 issues regarding a meter read that may affect our

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2 ability to, you know, definitively determine whether
3 it was related to billing, but I would say generally
4 how you define problems with SAP would not
5 necessarily prohibit us from analyzing these cases to
6 determine if it's -- a price right, high bill
7 complaint.

8 Q. Okay. So then if I could just
9 explore that a little bit. I believe, and please
10 correct me if I'm mischaracterizing the testimony.
11 The testimony that I heard before was that a
12 complaint is classified as pricing bill is correct
13 when a customer complains about a high bill and the
14 company does an investigation to ensure the accuracy
15 of that bill. And having confirmed the accuracy of
16 that bill, the company then concludes that the
17 complaint is attributable strictly to commodity
18 pricing. Is that a fair summary of the process that
19 you described earlier?

20 A. (Kopp) Yes.

21 Q. Okay. And so if the accuracy of
22 a pricing bill is correct, classification depends on
23 the company's ability to determine that the customer
24 has been receiving accurate bills, how would
25 continued inaccurate results from the SAP CIS system

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 not affect the company's ability to accurately
3 classify these complaints? That was a mouthful.

4 MR. FITZGERALD: Your Honor --

5 BY MR. COYNE: (Cont'g.)

6 Q. Did that make sense?

7 MR. FITZGERALD: -- I was going to
8 object. That's a compound question.

9 MR. COYNE: Yeah, I can -- I can
10 rephrase better. Thank you, counsel.

11 BY MR. COYNE: (Cont'g.)

12 Q. Is the company able to accurately
13 classify a complaint as pricing bill is correct if it
14 is unable to determine whether the customer has been
15 accurately billed?

16 A. (Campagiorni) Can you clarify
17 what you mean, inaccurately billed?

18 Q. I mean, billed in such a manner
19 that the company might be obligated to issue an
20 adjusted bill at some point in the future.

21 A. Would you have a reason for that
22 billing -- for that bill to be adjusted? What would
23 a reason be?

24 Q. I want to withdraw my previous
25 question and rephrase. I mean accurate in the sense

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 that Ms. Kopp, in explaining how the company's able
3 to classify complaints as pricing bill is correct. I
4 -- I -- I mean, accurate in whatever sense Ms. Kopp
5 used the word, or at least to the concept in her
6 answer to that question before.

7 A. I think company's position would
8 be if we had meter reads that we could verify
9 occurred and there was no problems with the meter and
10 they were accurate, we look at the usage and we
11 determine that there's a usage that fits with the
12 meter reads we have, we look at the price that the
13 customer was offered for their supply, I think then
14 we would say we have the factors that we need to
15 determine whether it is a high bill, price is right.

16 Q. Okay. And those determinations
17 that you just described, do they depend in any way on
18 the SAP CIS system?

19 A. They do.

20 Q. Okay. Thank you. Could you
21 please turn to your Rebuttal Exhibit CEP-4R and -- to
22 page 14, please. So starting at page 14, this
23 exhibit appears to show the company's internal
24 procedures for categorizing PSC complaints. Is that
25 accurate?

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2 A. (Kopp) Yes, that's correct.

3 Q. Okay. And then at page 17 of
4 this document, do you see the words, this -- I'm
5 quoting now, this is a dropdown menu, so pick one of
6 the options in the dropdown. You see that?

7 A. (Campagiorni) Could you refer us
8 specifically to where?

9 Q. Sure. There's no line numbers in
10 this document, but let me -- I'm sorry. It's -- it's
11 within the -- the bulleted paragraph at the top of
12 page 17.

13 A. (Kopp) I am sorry. Could you
14 repeat that?

15 Q. Sure. So I'm just asking you at
16 this point, if you see the words in the top bulleted
17 paragraph on page 17 of Exhibit CEP-4R, the words
18 quote, this is a dropdown menu, so pick one of the
19 options in the dropdown.

20 A. That's correct.

21 Q. Okay. So according to these
22 procedures, is each complaint assigned to only one of
23 the listed categories?

24 A. It is.

25 Q. Okay. So if a -- a customer were

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 to complain and that complaint touched on multiple
3 different issues, does the company have a defined
4 procedure for determining which category that
5 complaint would be classified as?

6 A. If there are multiple complaints
7 from a customer, we pretty much would categorize it
8 as the most relevant, whatever the -- the -- the
9 biggest part of the complaint would be.

10 Q. Okay. And so who is making the
11 determination as to relevance within the company?

12 A. That would be the consumer
13 outreach rep that's handling the case.

14 Q. Okay. And so the consumer
15 outreach rep has to exercise some measure of
16 discretion when determining how to classify these
17 complaints. Is that fair?

18 A. That is fair.

19 Q. Okay. And what guidance does the
20 company give to its consumer outreach reps with
21 respect to how that discretion should be exercised?

22 A. It's a judgment call by the -- by
23 the outreach rep.

24 Q. Okay. So the only category that
25 I see on the -- the company's list here that relates

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 to pricing is the category pricing bill is correct.
3 Is that the only classification that deals with
4 pricing?

5 A. (Campagiorni) Can you just refer
6 us to what page you're looking at just to make sure
7 we're --

8 Q. Sure.

9 A. -- we -- we are looking at the
10 same document.

11 Q. Yeah, if you give -- if you'll
12 just give me a moment, please. Okay. Thank you for
13 that. I'm looking at page CE -- I'm sorry, Exhibit
14 CEP-4R, page 14 of 18.

15 A. Would you kindly rephrase the
16 question again, please?

17 Q. Sure, of course. So on this page
18 we see a list of categories, the first of which is
19 pricing bill is correct, and then there's a number of
20 other categories. Do you see that?

21 A. Yes.

22 Q. Okay. The only one of these
23 categories that explicitly mentions pricing is that
24 first one, pricing bill is correct. So my -- my
25 question is, if a customer complains about the price

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 of their bill -- strike that, let me rephrase. Is
3 that first category pricing bill is correct, is that
4 the only category that deals with the -- the price
5 that the customer is charged on their bill?

6 A. I apologize. Can I ask you one
7 more time to rephrase the question?

8 Q. So is this first category pricing
9 bill is correct, is that the only category that
10 relates to pricing?

11 A. (Kopp) If -- if the complaint is
12 revolved -- revolved around a high bill and actual
13 reads have been compared, there's no usage spikes and
14 it's just the price of the bill, then yes, this is
15 the only category that we would file it under for --
16 for -- for pricing.

17 Q. Okay. If a customer called, for
18 example, complaining about the -- the price of their
19 bill, but the nature of their complaint was about a
20 surcharge rather than the commodity prices, how would
21 the company classify that type of complaint?

22 A. If the complaint is for anything
23 other than supply for surcharges delivery, then we
24 would file it under miscellaneous complaint and then
25 we would have an explanation in the proceeding column

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 of the basis of that complaint.

3 Q. Okay. So we just -- we discussed
4 before about how the customer outreach rep has to
5 exercise some discretion in classifying these
6 complaints. Does the company conduct any analysis to
7 independently verify whether it's customer outreach
8 reps are accurately categorizing these complaints?

9 A. Yes. I'm the supervisor of the
10 group, I review complaint categories with my team
11 each month.

12 Q. Okay.

13 A. We -- we have weekly team
14 meetings and we review different complaints.

15 Q. Okay. I'd like to change topics
16 please. Could we go to your rebuttal testimony at
17 page 21, please. So at page 21, line 20, the panel
18 refers to something it calls the modified staff
19 calculation methodology. Could you just clarify what
20 the panel means by that?

21 A. (Doane) So to clarify when --
22 what we mean when we say the modified version, we're
23 referring to specifically what staff provided in
24 their testimony specific to an exhibit. I do not
25 have that exhibit number in front me.

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2 Q. Okay. So if we back up to page
3 20, line 14 then, the testimony says that the company
4 maintains that customer callbacks should be included
5 within the numerator and denominator of the
6 calculation. Do -- do you see that?

7 A. Yes.

8 Q. Do -- do customer callbacks --
9 does that include calls that are directed to the
10 callback queue?

11 A. Correct.

12 Q. Does it also include customers
13 who are placed on virtual hold?

14 A. It's a separate queue.

15 Q. So does the phrase customer
16 callbacks within your testimony, does that include
17 virtual -- I'm sorry, maybe I don't understand your
18 answer. Are customers placed on virtual hold? Are -
19 - are they -- are those customers considered as
20 having answered with having their call? Let me
21 withdraw. I'll ask a better question. For customers
22 placed on virtual hold, are they treated as having
23 had their call answered within 30 seconds for
24 purposes of this metric under the company's proposal?

25 A. Just to clarify virtual hold

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2 transfer is -- is separate than callbacks. A
3 callback queue is -- is a different functionality.

4 Q. Okay. And I -- I -- so I
5 understand that there are different functionalities.
6 I think my question is, under the proposal that's
7 contained in the panel's rebuttal testimony, would
8 customers who are placed on virtual hold be treated
9 for purposes of this metric as though their calls had
10 been answered within 30 seconds? Does that make
11 sense?

12 A. Virtual hold is part of service
13 level, but only if we are successfully reconnected
14 with the person who accepted that virtual hold
15 transfer.

16 Q. Okay. That makes sense. Thank
17 you. If we could turn ahead in your rebuttal
18 testimony to page 33, please. So at lines five to
19 eight of page 33, the panel expresses significant
20 concerns about future mandated billing changes. Do
21 you see that?

22 A. Yes, we do.

23 Q. Is the panel aware of any such
24 changes that are -- will occur in the rate year?

25 MR. FITZGERALD: Could I have that

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 page reference again? I apologize, counsel.

3 MR. COYNE: Sure. Page 33, lines five
4 to eight.

5 MR. FITZGERALD: Thank you.

6 MR. HALLY: We're generally aware of
7 commission proceedings that may allow for different
8 savings rates for CDG. That would be a different
9 billing rate. We're not aware of exactly when those
10 changes would take place.

11 BY MR. COYNE: (Cont'g.)

12 Q. Okay. Fair enough. So it's fair
13 to say that there's some -- the panel is speculating
14 as to what might happen during the rate year in that
15 portion of their testimony?

16 MR. FITZGERALD: Your Honor, I object
17 to that characterization. Argumentative.

18 A.L.J. COSTELLO: Sustained.

19 MR. COYNE: I'll move on, Your Honor.

20 BY MR. COYNE: (Cont'g.)

21 Q. On page 34 of the rebuttal
22 testimony, lines one to nine. The panel discusses
23 the missed appointment bill credit. You see that?

24 A. (Doane) Yes.

25 Q. Okay. Some number of missed

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2 appointments is a normal and expected part of utility
3 operations. Is that fair to say?

4 A. Yes. That's fair to say.

5 Q. Okay. And then also on page 34,
6 on line four, the panel expresses some concern about
7 staff's recommended \$20 bill credit for adjusted
8 bills and estimated bills because those types of
9 bills are driven by quota, a large number of factors,
10 many of which are not within the control of the --
11 the company. Do -- do you see that?

12 A. Yes, we do.

13 Q. Okay. So staff's proposal
14 accepts from those credits regularly scheduled
15 estimated meter readings and circumstances where the
16 company has to estimate a meter reading because the
17 customer or another person who controls access to the
18 meter refuses to provide access. Those are
19 circumstances that are clearly outside of the -- or
20 not necessarily outside of the company's control, but
21 not something for which the company should be subject
22 to the credit.

23 MR. FITZGERALD: Your Honor, I -- I do
24 object in the sense of these. If -- if there's a
25 question here as to this panel and not what's in

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2 staff's testimony.

3 MR. COYNE: There's absolutely a
4 question coming, Your Honor. I'm just trying to
5 provide some context of the question make sense.
6 I'll get to the question.

7 BY MR. COYNE: (Cont'g.)

8 Q. Is the panel aware of other
9 factors that are not within the company's control
10 that could nevertheless lead to adjusted or estimated
11 bills?

12 A. Sorry, we think we've addressed
13 this in our rebuttal testimony. We're just looking
14 for --

15 Q. Sure. Take your -- take your
16 time.

17 A. (Doane) Thank you for your
18 patience.

19 Q. Sure, of course.

20 A. So specific to CDG and the
21 adjusted bills, we did include that in our rebuttal
22 testimony, which is on page 32, lines 13 through 16.

23 Q. And if you could bear with me for
24 just one second.

25 A. Sure.

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2 Q. Thank you. Okay. I do see that
3 in your testimony. Do those reasons also apply to
4 the non CDG related credits that staff has proposed
5 related to adjusted and estimated bills?

6 A. Thank you. To your question, I
7 think though our response is -- is also included in
8 our rebuttal testimony. Specifically page 25,
9 starting line 11 and extending to page 26.

10 Q. All right. Thank you. One final
11 topic, please. Can we go back to your initial
12 testimony at page 32? I'm sorry, actually, before we
13 move on, one final question on the bill credits. If
14 the company were to experience further issues with
15 the SAP CIS system that would result in an increase
16 in estimated or adjusted bills, is that a
17 circumstance that the company would consider to be
18 outside of its control?

19 A. (Campagiorni) So can you just
20 clarify your question a little bit for me first?

21 Q. Sure. So it's the panel's
22 testimony, and I'm sorry I asked you to move on, but
23 in your -- your rebuttal testimony, the panel is
24 concerned about the recommended \$20 bill credit
25 because adjusted bills and estimated bills are driven

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2 by a large number of factors, many of which are not
3 within the control of the company. And I guess my
4 question is, if further issues with the SAP CIS
5 system were to result in a spike in the use of actual
6 -- estimated or adjusted bills, does the company
7 consider that to be one of those circumstances that
8 are not within its control?

9 MR. FITZGERALD: Your Honor, I do
10 object in the sense that it -- it does call from
11 speculation as to why the CIS system wouldn't be
12 working. It may be other factors that could cause
13 that, such as a disaster or other things that this
14 panel couldn't anticipate. If you'd like to narrow
15 your question, I think that would be helpful.

16 BY MR. COYNE: (Cont'g.)

17 Q. If the company were to continue -
18 - experience continued issues with its SAP CIS
19 system, similar to those that it has been
20 experiencing since 2001, would the company consider
21 that to be a circumstance beyond its control?

22 A. I don't mean to be difficult, but
23 it -- it does depend, right? If there's an outside
24 circumstance that caused things that you might say
25 were part of the SAP system, it -- it -- it is

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2 calling for a lot of speculation to be -- to -- to be
3 clear. It's -- it's hard for me to answer that
4 without knowing what that circumstance was that
5 caused what you're classifying as an SAP system
6 issue.

7 Q. Okay. So would it be fair to say
8 that not all issues related to the SAP CIS system
9 would necessarily be in the company's control?

10 A. I would agree with that.

11 Q. Okay. All right. Now final
12 topic, if we could turn back to your initial
13 testimony, page 32, line four. So at this portion of
14 your testimony, the panel is discussing the
15 relationship between the COVID pandemic and customer
16 arrears. Correct? So, line seven, the panel
17 testifies that customer arrears balances have grown
18 significantly since the start of the pandemic in
19 March, 2022. Correct?

20 A.L.J. COSTELLO: March, 2020. No,
21 I'm sorry.

22 MR. COYNE: Thank you. Thank you very
23 much, Your Honor. Yes. March, 2020.

24 BY MR. COYNE: (Cont'g.)

25 Q. Does the panel attribute this

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 increase in customer arrears solely to the effects of
3 the COVID pandemic?

4 A. No.

5 Q. Okay. What other factors is the
6 panel aware of?

7 A. I think we've addressed a lot of
8 this in our -- in our testimony already. In part,
9 the anxiety and confusion that we caused with
10 adjusted bills -- delayed bills caused an erosion of
11 customer trust, which the company is partly
12 responsible for. In addition to the factors
13 mentioned here in the testimony such as that you
14 mentioned the Parker Mosley Act, some of the arrears
15 management for business programs that had some
16 moratoriums related to it.

17 There has been, you know, increased
18 rhetoric through social media and other channels that
19 I think have exacerbated that as has the conflation
20 with really significantly higher commodity costs.
21 Especially starting in early 2022, which I think gave
22 rise to customers questioning their bills because we
23 hadn't seen commodity spike -- spike increases at
24 that magnitude, I don't know, in decades. So I think
25 all those factors contributed to people not paying

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 their bills and arrears growing.

3 MR. COYNE: Your Honor, I don't have
4 any further questions for this panel. We do have a
5 number of IR responses that this panel authored that
6 we would like to admit into the record, provided
7 there are no objections.

8 A.L.J. COSTELLO: That's fine.

9 MR. COYNE: Mr. Fung has them here.
10 We'll -- we'll hand them out.

11 MR. FUNG: Oh, yes.

12 MR. COYNE: One of them has a
13 confidential attachment. We have both confidential
14 and redacted versions for the parties if they, you
15 know, wish to -- to see them.

16 MR. FITZGERALD: Your Honor, can we go
17 off the record for one moment?

18 A.L.J. COSTELLO: Sure. Off the
19 record.

20 (Off the record 10:24 a.m.)

21 (On the record 10:25 a.m.)

22 MR. FITZGERALD: I -- I just --

23 A.L.J. COSTELLO: And I'm just going
24 to indicate -- we're going to -- I'm going to mark
25 them for identification at this point, so I'm just

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 going to indicate IR 301 is Exhibit 552 for
3 identification. IR 308 will be 553, IR 353 will be
4 554, IR 369 will be 555, IR 583 will be 556, IR 618
5 will be 557, the public version of IR 739 will be
6 558, the confidential version of IR 739 will be 559,
7 IR 741 will be 560, IR 771 will be 561, IR 774 will
8 be 562, and IR 785 will be 563. And you may continue
9 then.

10 MR. COYNE: Thank you, Your Honor.
11 And we would just ask at this time that those IRs
12 that you've marked for identification be moved into
13 the record.

14 A.L.J. COSTELLO: Is there any
15 objection?

16 MR. FITZGERALD: No objection, Your
17 Honor. Just with one caveat, which would be that if
18 there's been an update to one of these
19 interrogatories, that would also be marked in as part
20 of that exhibit. At this time I'm not aware of any,
21 but we will need to double check.

22 A.L.J. COSTELLO: Okay. Subject to
23 that, double checking. And that will be admitted if
24 you find that there is an update, these documents are
25 moved into evidence as previously identified

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2 exhibits. And is that the end of your --

3 MR. COYNE: Yes, that concludes.
4 Yeah.

5 A.L.J. COSTELLO: Okay. Before we
6 move on, we do have a few questions.

7 A.L.J. MORENO: Yes.

8 A.L.J. COSTELLO: And I'm going to
9 turn it over to Judge Moreno.

10 A.L.J. MORENO: So I just had two
11 clarifications to make to the testimony that I heard.
12 So I believe staff counsel asked some questions
13 regarding the complaint categories, and there was a
14 discussion of customer service representatives
15 exercising some discretion. And staff counsel's
16 question was whether or not there was a review of the
17 representatives classifications of those categories.
18 Is -- is that right?

19 MS. KOPP: Yes. I just want to
20 clarify that it's a consumer outreach representative
21 who makes the decisions and we handle PSC complaints,
22 not customer service.

23 A.L.J. MORENO: Sorry about that.

24 MS. KOPP: That's okay.

25 A.L.J. MORENO: And is there an audit

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 conducted at all of the chosen categories that, that
3 consumer outreach representative selects at any point
4 in the process?

5 MS. KOPP: There's not an audit done.
6 We do file this report though, as far as our
7 categorization quarterly.

8 A.L.J. MORENO: Okay.

9 MS. KOPP: PSE.

10 A.L.J. MORENO: And then the other
11 question I had was regards to there was a discussion
12 of the virtual hold times, and I believe the question
13 posed by staff was whether or not if a customer was
14 put on a virtual hold, whether that might be
15 considered answered within 30 seconds. Is that
16 right?

17 MR. DOANE: That is correct.

18 A.L.J. MORENO: And you indicated that
19 the answer was -- was yes, if they were later
20 connected, is that correct?

21 MR. DOANE: Yes, if we were actually
22 connected with the customer.

23 A.L.J. MORENO: Okay. And is that
24 regardless of the time that passes, that they might
25 be on virtual hold?

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2 MR. DOANE: It is.

3 A.L.J. MORENO: Okay. Thank you.

4 A.L.J. COSTELLO: Okay. Before --
5 before we turn to our next question, we'll just take
6 a 10-minute break. So it's -- we'll go off the
7 record, it's 10:30. Please be back at 10:40.

8 (Off the record 10:30 a.m.)

9 (On the record 10:40 a.m.)

10 A.L.J. COSTELLO: I just want to
11 remind the panel that you're still under oath. And
12 before we begin with questioning, I just noticed that
13 a representative from the Town of Olive is here. If
14 you'd like to make an appearance.

15 MR. STRAUSS: Simon Strauss.

16 A.L.J. COSTELLO: Okay. Simon
17 Strauss. Okay. Our next questioner will be UIU.

18 MR. ROSWICK: Morning, Your Honors.
19 Morning, panel.

20 PANEL: Good morning.

21 MR. ROSWICK: Can you hear me?

22 PANEL: Yes.

23 MR. ROSWICK: Just at the outset Your
24 Honors want to note that UIU will not be asking as
25 many questions as we had anticipated in light of the

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 responses already provided by the panel this morning.
3 And I would also like to note that we don't -- we
4 don't expect to be using our allotted one-hour time
5 this morning that we were sort of given to do this
6 questioning, so just want to note that.

7 A.L.J. COSTELLO: Thank you.

8 CROSS-EXAMINATION

9 BY MR. ROSWICK:

10 Q. Panel, I'm going to refer you to
11 the corrected rebuttal testimony of the customer
12 experience panel filed by the company. I believe you
13 still have the testimony available to you, correct?

14 A. (Doane) Correct.

15 Q. I believe the panel is familiar
16 with the company's various customer service
17 performance indicators or CSPs, correct?

18 A. Correct.

19 Q. I would like to focus on the
20 percent of calls answered within 30 seconds metric.
21 Specifically I'd like to refer you to page 19, lines
22 -- around lines 16 to 19 of your corrected rebuttal
23 testimony. In those lines, you state how the company
24 has historically calculated the -- this metric. Is
25 that correct?

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2 A. Sorry, just one moment --

3 Q. Sure.

4 A. -- so we can get there.

5 Q. Sure.

6 A. Correct, yes. We see that

7 Q. Specifically you state that your
8 calculation includes callbacks, is that correct?

9 A. Correct.

10 Q. Now I'd like to refer you to the
11 commission's order adopting revisions to customer
12 service reporting metrics in case 15-M-0566 issued
13 and effective on August 4th, 2017. My colleague will
14 be distributing that order. When you receive the
15 order, please go to page five of the manual, which is
16 an appendix to the order, and I'll give you some time
17 to find it.

18 A. Okay. We're there.

19 Q. Page five states how the percent
20 of calls answered by representatives within 30
21 seconds should be calculated, is my understanding
22 correct?

23 A. That is correct.

24 Q. Now that you have page five in
25 front of you, can you confirm if there's anywhere on

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 this page where the word callback is mentioned?

3 A. Thank you. Per this order there
4 is no use or mention of the term callback.

5 Q. Thank you for confirming. I'd
6 like to move now to the residential customer
7 satisfaction survey metric. So I'd like to go back
8 to the testimony that we were previously looking at
9 on page 17, lines 8 to 12.

10 A. I'm sorry, just -- I'm sorry.
11 Just to clarify, the -- the rebuttal testimony?

12 Q. Yes, I'm sorry.

13 A. Thank you.

14 Q. Lines 8 to 12. In those lines,
15 the panel indicates that on average the statewide
16 pilot survey results are 17 percent lower than the
17 existing residential customer satisfaction survey
18 results. Is that correct?

19 A. That is correct.

20 Q. Has the company conducted any
21 study or otherwise inquired into why the statewide
22 pilot survey results are lower than the existing
23 survey?

24 A. Formally the company has not done
25 analysis, but it's important to note that they are

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 two separate surveys with two separate methodologies.

3 Q. Following up on that is the -- is
4 the -- is the panel able to provide a rationale as to
5 the differing results between the statewide pilot
6 survey results and the existing residential customer
7 satisfaction survey results?

8 A. The company has not provided or
9 conducted any formal analysis.

10 Q. Thank you for confirming.

11 MR. ROSWICK: No more -- we have no
12 more questions for the panel, Your Honors.

13 A.L.J. COSTELLO: Okay. Thank you.
14 PULP.

15 CROSS-EXAMINATION

16 BY MS. CORP:

17 Q. Good morning. My name is Alicia
18 Corp and I'm the Supervisor of Direct Services and
19 Counsel at the Public Utility Law Project. I'm going
20 to start with some questions and I'm going to pass it
21 over to my colleagues. I I'm going to start on page
22 45, line -- lines one through four of this panel's
23 rebuttal testimony. The panel states that the
24 company plans to resume residential collections that
25 will start with a small group of customers. Can you

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2 explain how the small group of customers is picked?

3 A. (Campagiorni) So I think we
4 addressed that in our testimony on page 44 in terms
5 of rolling out a phased rollout in conjunction with
6 the monthly meter reading initiative and trying to
7 minimize customer concerns about receiving collection
8 contacts on bills not calculated from actual meter
9 reads. And we continue to lay out that rationale in
10 the testimony.

11 Q. Do you have an estimate of how
12 many customers will be included in the small group?

13 A. We are still working through the
14 plans of that with the staffing associated with those
15 plans to make sure we give customers a good
16 experience with these collections.

17 Q. Do you plan on alerting the small
18 group of customers that you were picking ahead of
19 time?

20 A. So can you just repeat the
21 question so I answer it accurately, please.

22 Q. Will you be telling the small
23 group of customers ahead of time that you'll be
24 starting with them with residential terminations?

25 A. Yeah. As part of our ongoing

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2 communications, we have been notifying customers
3 generally of just arrears and dollars owed, but
4 specifically to this initiative, we'll be letting
5 customers know as part of communications that we will
6 be starting final termination notices for these steps
7 at a customers. Yes.

8 Q. And will any of these
9 communications be on Central Hudson's website?

10 A. Website is generally included in
11 all our plans for communications.

12 Q. Thank you. How will the company
13 be communicating with the county department of social
14 services offices when residential service
15 terminations begin for the small group?

16 A. (Kopp) Consumer outreach handles
17 communications with Department of Social Services and
18 we regularly email them any -- you know, anything
19 that we have to advise, so collections would be part
20 of that.

21 Q. Will the small group consist of
22 any energy affordability program customers?

23 A. We are excluding low-income
24 customers from collections during this first round.

25 Q. Thank you. What process will the

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 company be using to ensure accuracy of the customer's
3 bill?

4 A. (Campagiorni) So I think that
5 answer is within our testimony on page 45, beginning
6 at line 11 in terms of how we're going to handle
7 those customers.

8 Q. Thank you. Can you explain what
9 the company's process will be for customers where
10 English is not their first language.

11 A. They will go through the same
12 process.

13 Q. Will there be any other specific
14 groups of customers omitted from the small groups
15 such as disadvantaged communities?

16 A. Could you please repeat your
17 question.

18 Q. Earlier you mentioned that low-
19 income customers were not going to be included in the
20 small group. Are there any other groups of customers
21 that won't be included such as disadvantaged
22 communities?

23 A. When you say individuals like
24 disadvantaged communities, can -- can you just help
25 define that for me please?

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2 Q. Just customers that are within
3 the disadvantaged communities.

4 A. So if I live within a
5 disadvantaged community and I am not a low-income
6 customer, I have no tags for that. I might be living
7 in a million-dollar home if I'm within a
8 disadvantaged community. Are -- is the question
9 suggesting I should not go after those people for
10 arrears and collections? I just want to clarify that
11 I understand your question correctly.

12 Q. Yes, it's pretty much what I'm
13 asking.

14 A. Yeah. My understanding of
15 disadvantaged communities is there -- it's a very
16 broad term that encompasses community and there is a
17 number of factors, maybe over 40 factors that would
18 have customers included in disadvantaged communities.
19 Just because you reside in a disadvantaged community
20 doesn't mean you reside in any disadvantaged census
21 track necessarily, so I think the exclusion of
22 customers will be towards what you asked before, the
23 low-income customers, not everyone within a
24 disadvantaged community.

25 Q. Okay. Thank you. How long does

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 the company anticipate the small group program to
3 last?

4 A. I apologize. Can you ask the
5 question one more time?

6 Q. How long does the company
7 anticipate the small group program to last?

8 A. I think the company's primary
9 concern is that we have the ample resources to
10 provide a good process and a good customer
11 experience, and so we're going to keep the program
12 measured and monitor how we are handling those
13 customers in making sure they're getting a good
14 customer experience, so it's hard for me right now to
15 speculate how long that would last.

16 Q. Can you elaborate on your plans
17 for when you open the collections process up to all
18 residential customers?

19 A. (Ryan) So as we've stated in
20 testimony, the company will take -- be taking a very
21 measured slow approach to that rollout for automated
22 dunning or collections activities for both
23 residential and non-residential active accounts. It
24 will include data validation performed on a daily
25 basis staffing and a customer experience that we

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 strive to achieve so we can work with customers in
3 order to get their payments made in turn to a payment
4 agreement or get them assistance from the agency. So
5 it'll be a very, very slow measured approach,
6 striving to achieve all the customer service
7 experience that we would all want.

8 Q. Thank you. Is the company
9 performing any collections activities currently for
10 residential?

11 A. (Campagiorni) Yes, we are
12 currently sending letters and emails and other
13 notices of customer arrears.

14 Q. Okay. Thank you. If you could
15 please now turn to page 46, starting on line 10
16 through 13 of this panel's rebuttal testimony.
17 Sorry, one second. I'm going to go back. Are you
18 currently sending any customer accounts to collection
19 agencies?

20 A. (Ryan) Yes. Starting in July of
21 2023, the company did roll out the automated
22 collections or dunning activities for finalized or
23 closed accounts. Those customers do go through a
24 process of several communications after they received
25 their final bill before then it is submitted to a

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 collection agency.

3 Q. Thank you. Okay. Now turning to
4 page 46 of the rebuttal testimony on lines 10 through
5 13. Here the panel states that the company has
6 conducted numerous events since December of 2022.
7 Does the company have staff at these events that can
8 speak a language other than English?

9 A. Yes.

10 Q. How many staff members do you
11 have that speak a language other than English?

12 MR. FITZGERALD: Your Honor, just --
13 just as to the form of the question, it's -- it's
14 vague as to the company's overall compliment of
15 people that speak multiple languages versus those
16 that might be in -- in attendance at these 11 events.

17 A.L.J. COSTELLO: That's sustained.
18 Can you just rephrase your question?

19 BY MS. CORP: (Cont'g.)

20 Q. At these outreach events, how
21 many staff members do you have that speak a language
22 other than English?

23 A. We try to staff at least one
24 bilingual representative to assist customers at each
25 of these events.

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2 Q. How many existing customer
3 service representatives at the company speak a
4 language other than English?

5 A. (Campagiorni) I -- I don't have
6 that data right here right now.

7 Q. For these outreach events, has
8 the company considered collaborating with
9 organizations who assist individuals whose primary
10 language is one other than English?

11 A. (Kopp) We collaborate with many
12 agencies, different, different events. I -- I don't
13 know, it would be a good idea to bring some -- you
14 know, have some of those agencies that speak another
15 language to assist customers. Absolutely.

16 Q. Thank you. How is the company
17 planning to communicate with customers who speak
18 other languages such as Spanish in the rate year?

19 A. (Campagiorni) Can you be a little
20 bit more specific in terms of the question? It's --
21 it sounds very broad to me. I just want to make sure
22 we're answering your question to -- for the intent
23 that you're trying to get to.

24 Q. If a customer is calling that
25 speaks another language, how does the company

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 approach that customer?

3 A. The company maintains staff of
4 bilingual customer service representatives who are
5 specifically staffed to the queue in which those
6 calls would be forwarded to. Sorry. And just to
7 further elaborate, the company also has access to and
8 leverages an interpreter line for Spanish or any
9 other language for callers

10 Q. Is a -- is a customer who speaks
11 another language, then tracked by the company so that
12 when follow up communication is needed, the company
13 is aware that the customer speaks a different
14 language?

15 A. Within our billing system, there
16 is the functionality to track the -- the customer's
17 primary spoken language and correspondence
18 preferences.

19 Q. Thank you. Is the company's CIS
20 billing system currently producing bills in a
21 language other than English?

22 A. The -- the billing document
23 itself is not rendered in Spanish or any other
24 language currently.

25 Q. Thank you. Moving now to page 11

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 of the panel's rebuttal testimony, line 17.

3 A. (Hally) I am sorry, could you
4 repeat those lines again?

5 Q. Yeah. It's page 11, line 17.
6 The panel states, quote, PSC complaints received a
7 lagging indicator, end quote. What does a lagging
8 indicator mean in this context?

9 A. (Doane) What the panel is
10 referring to there is the actual process and the
11 timeline that it takes to file the complaint, process
12 the complaint, and that being a lag in time from the
13 actual issue or concern.

14 Q. Thank you. Now turning to page
15 12, lines 11 through 20 of the rebuttal testimony.
16 Here the panel states that an analysis was done that
17 showed the majority of billing issue comments at the
18 in-person public statement hearings were regarding
19 past billing issues. Can you elaborate on the
20 analysis that was done to come to that conclusion?

21 A. (Hally) That analysis is included
22 as Exhibit CEP-3R.

23 Q. Did any of the company's staff
24 members who worked on creating Exhibit CEP-R attend
25 any of the public -- public statement hearings?

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2 A. I am not aware of anyone that
3 contributed to this analysis attended the hearing or
4 not.

5 Q. Did the company receive customer
6 consent before conducting the review based off of
7 their public comments?

8 A. Could you rephrase that question?
9 I just want to make sure I completely grasp it.

10 Q. Did the company reach out to the
11 customers at the -- from the public statement
12 hearings before conducting the analysis?

13 A. No, we did not reach out to these
14 customers before conducting the analysis of the
15 public comments.

16 Q. Did the company follow up with
17 any of the customers at the public -- from the public
18 statement hearings?

19 A. (Kopp) Yes, we -- we did follow
20 up with customers. Not all of them, but some of the
21 customers on the -- the hearings.

22 Q. Can you say approximately how
23 many of the customers you reached out to?

24 A. I am sorry. Could you repeat the
25 question?

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2 Q. Do you know how many -- how many
3 approximately customer -- how -- sorry, how many
4 customers did you reach out to approximately from the
5 public statement hearings?

6 A. I -- I don't know how many. We
7 reached out to customers that -- had still had open
8 issues after the public statement hearings. Many of
9 the customers that made statements, like we said in
10 our -- in our rebuttal, they were older issues. They
11 were from -- that had already been closed and solved.

12 Q. Thank you. Did the company
13 conduct a similar customer review of the virtual
14 public statement hearings that were held in these
15 proceedings?

16 A. No, we did not.

17 Q. Can you explain why you didn't do
18 the same analysis for the virtual public statement
19 hearings?

20 A. (Hally) I'm sorry, could you just
21 repeat that question.

22 Q. Can you explain why you didn't
23 conduct a similar customer review of the virtual
24 public statement hearings?

25 A. So this exhibit is included in

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 our rebuttal testimony because it responds to the
3 direct testimony that was put forward in this case.

4 Q. Okay. Thank you.

5 MS. CORP: I'm going to pass it over
6 to my colleague Dan Russell.

7 BY MR. RUSSELL:

8 Q. Good afternoon, everyone. Thanks
9 for testifying here today. I'd like to start out by
10 directing the panel to your rebuttal testimony on
11 page 32, lines 12 through 18. I apologize, I think
12 this might be the uncorrected page and line number.
13 If you just give me a moment to -- it's actually page
14 35, lines 19 through -- to -- on page 36. Panel is
15 ready for a question?

16 A. (Hally) Yes.

17 Q. So for call abandonment rates,
18 how accurately and how closely can the current IVR
19 meet reporting metrics?

20 A. (Doane) So we -- we can't provide
21 a specific measure or to quantify accuracy, but to
22 elaborate we are able to obtain the information
23 through a series of queries. It's not just a simple
24 report out of our current IVR system.

25 Q. And would that be true for call

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 hold times as well?

3 A. That is accurate, yes.

4 Q. And for call handling times as
5 well?

6 A. Same, yes.

7 Q. And for call answer rates as
8 well?

9 A. Yes.

10 Q. Has the company explored whether
11 there are alternative options to meet these metrics
12 besides a full system modernization?

13 A. (Hally) I apologize if -- if
14 you're just a little patient with us. If you could
15 repeat that question just because I want to make sure
16 we understand the nuance that you're trying to get
17 to.

18 Q. Not at all. Happy to clarify
19 anything for the panel. Has the company explored
20 alternative options to meet these metrics besides the
21 full system modernization?

22 A. (Doane) Yeah, acknowledging that
23 the modernization is the -- the -- our view of the
24 best approach. The -- the other alternative that we
25 have analyzed would be to continue that query

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2 process, which would be having an analytics and
3 making sure that we have the analysts and analytic
4 resources to support that going forward.

5 Q. I would now like to direct your
6 attention to DPS IR-402. My colleague is now handing
7 them out. DPS IR-402 has been previously been marked
8 and entered as part of Exhibit 352. I just wanted to
9 ask a clarifying question regarding Part C of that
10 response. It is my understanding that the company
11 did not conduct any sort of competitive analysis
12 regarding alternatives to the cloud-based IVR. Is
13 this a correct understanding?

14 A. The -- the company has not yet
15 completed a formal RFI process for other vendor
16 solutions.

17 Q. And why didn't you consider
18 requesting competitive analysis such as a competitive
19 bidding product -- process for this proposal?

20 A. So I'm sorry, can you just repeat
21 that?

22 Q. Yeah. what was the panel's
23 rationale for choosing not to engage in a competitive
24 and analytical process such as a competitive bidding
25 process?

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2 A. Sure. So you know, following our
3 -- you know, our governance and practices associated
4 with IT projects, at this point this was an
5 assessment to get a -- you know, a higher-level
6 assessment of costs and needs and business
7 requirements. So we felt at this point in time that
8 that was the appropriate measure in order to obtain
9 that information.

10 Q. Did the panel engage in any fact
11 fighting to determine what the industry standards for
12 IVR are?

13 A. Yes, we did.

14 Q. Could you talk about that process
15 a little bit?

16 A. Sorry, just to clarify. Is there
17 a specific part of that process that you would like
18 us to comment on?

19 Q. I'm just trying to get an
20 understanding for what resources the company used to
21 determine that the current -- the proposed IVR system
22 was in fact the best that met the industry standards
23 and could potentially suit the needs of Central
24 Hudson and its customers the best.

25 A. Yeah, so -- you know, our -- our

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2 process for that included, you know, benchmarking,
3 other utilities, industry standards outside of the
4 utility as IVR is very applicable to other
5 industries, including banking and other customer
6 service. We tend to also refer to Gartner and
7 Forrester. They have their magic quadrant, which
8 would identify certain metrics for the software
9 solutions.

10 That did lead us towards Genesis and -
11 - and another solution as well. And then we did
12 conduct, you know, vendor communications with
13 Genesys, our current system vendor, to get more
14 information about functionality that we knew we
15 wanted to meet with any future enhancements.

16 Q. Why did you -- strike that. And
17 what led you to decide not to pursue the other
18 option?

19 A. Thank you. So kind of going back
20 to what I stated earlier, for the purposes of this
21 estimate and this exercise and the needs, we did
22 focus on our current vendor, our relationship, and
23 the ability to obtain information from them.
24 However, we will continue to review and -- and pursue
25 potential other solutions that are available.

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2 Q. Thank you. I just want to fall
3 back on a question my colleague asked earlier. You
4 mentioned before that the billing system was capable
5 and had the functionality of marking customers that
6 spoke languages other than English as their primary
7 language, but you didn't mention whether or not that
8 was a practice the company currently engaged in. Is
9 that something that the company actively pursues with
10 customers that are not English as their first
11 language?

12 A. It is, yes, the current practice.

13 Q. Thank you for clarifying that.
14 I'll pass it on to my colleague Laurie Wheelock now.

15 CROSS EXAMINATION

16 BY MS. WHEELOCK:

17 Q. So good morning to the panel. My
18 name is Laurie Wheelock, I'm the executive director
19 of PULP and I'll be asking some questions this
20 morning. First, I'd like to turn the panel's
21 attention to a pre-filled exhibit. It's 455. We
22 will be handing out copies to the room, so my
23 colleague, Theresa Hotte will do that now. And then
24 after you receive this exhibit, if you could turn to
25 page 58, and then we'll -- we'll go from there. I'll

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2 gladly lead the panel.

3 So again, for the panel's review and
4 for the room, this is pre-filed Exhibit 455. It was
5 originally introduced with William D. Yates direct
6 testimony as Exhibit 4, and I ask the panels to turn
7 its attention to page 58. Page 58. And the numbers
8 are in the right-hand top corner, is PULP Set 6, IR-
9 33. And if the panel could indicate once they're
10 ready to proceed. Does this interrogatory response
11 appear familiar to the panel?

12 A. (Doane) Yes.

13 Q. Can the panel start by explaining
14 what the role is of a customer service representative
15 in relation to reviewing the accuracy of a customer's
16 account?

17 A. So a customer service
18 representative is an employee who's typically
19 assigned to the phones to handle inbound calls. And
20 during the transactions or interactions with the
21 customer, they are reviewing components of the
22 customer account, including bills -- components of
23 billing in order to answer and address customer
24 questions and/or issues.

25 Q. And how is that role different

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2 than the customer support assistant?

3 A. So specific to the customer
4 support assistant, the real key delineation there is
5 they are not assigned to phones to address inbound
6 call volumes. They are doing what we would consider
7 back-office work for customer interaction.

8 Q. And how is that role different
9 than the customer billing technician?

10 A. So to further clarify, a customer
11 billing technician again, is a -- a role that does
12 not align with inbound call volumes. They're not
13 addressing live calls, they are doing back-office
14 activities. Probably most specifically for that role
15 would include some of the more complex billing
16 structures that would include PV, net metering, CDG,
17 and accounts of that nature.

18 Q. So of the three roles, the
19 primary role that interacts with customers is the
20 first one, the customer service representative. Is
21 that correct?

22 A. For live interactions? That is
23 correct.

24 Q. And with these live interactions,
25 what does the company staff do that supports the

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2 audit of customer accounts?

3 A. (Campagiorni) Hi, Laurie. Can
4 you just define -- when you say audit, can you tell
5 me in what context you're using that word? And --
6 and maybe just clarify a little bit, what do you mean
7 by an audit? I just want to make sure we answer the
8 intent of your question.

9 Q. Absolutely. So if a customer
10 calls the company and is concerned about the accuracy
11 of their arrears, for instance, what does the
12 customer service representative do during that call
13 that helps them understand what their arrears are,
14 the billing, any of those particular questions?

15 A. (Doane) So the -- the overall
16 process and its intricacies will, you know, be
17 different depending on the actual customer, customer
18 account and situation, and -- and general inquiry.
19 But for, you know, general purposes when a CSR is
20 fielding a question from an inbound call from a
21 customer request, rather, they're going to look into
22 bills that are rendered, issued, account balances,
23 transactions that would include any payments or if
24 there's any type of adjustments or anything of that
25 nature to understand the overall AR balance and

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2 status of that account. And then that would lead to,
3 you know, additional communications to address any
4 specific needs that the customer might have.

5 Q. And so are any of those customer
6 service representatives certified public accountants?

7 A. Not to our knowledge, no.

8 Q. Is the company looking to offer
9 any sort of enhanced training materials for its
10 customer service representatives as you're planning
11 to pursue collections activities in the rate year?

12 A. (Ryan) The short answer is yes,
13 they will. There is a comprehensive training
14 onboarding and enhanced training program that the
15 company has been undergoing for quite some time now.
16 Looking at fundamentals, New York state rules and
17 regulations, company procedures, policies, and then
18 tying into that as well, there is -- what is it
19 called? A training needs assessment that is being
20 done. That analysis is still underway in order to
21 determine what different training courses individuals
22 need prior to collections being rolled out. Not just
23 within our customer service group, but also with our
24 field forces as well.

25 Q. And so would it be fair to say

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2 that the company is coming up with a plan for
3 enhanced training materials?

4 A. I would say that the company
5 already has a plan and has a process in place that it
6 has been undergoing for quite some time now to
7 enhance the training materials and provide that
8 training to customer service reps and other
9 employees.

10 Q. And with this ongoing work, is
11 the company providing any updates to Department of
12 Public Service staff, and if so, how often and in
13 what means?

14 A. Just to make sure I answer the
15 question correctly, could you restate it for me
16 please?

17 Q. Absolutely.

18 A. Thank you.

19 Q. With the company's ongoing work
20 and the plan for enhanced materials, are there any
21 sort of reporting requirements materials shared with
22 the Department of Public Service staff?

23 A. There's no reporting requirements
24 that we're aware of. We would certainly make
25 anything available that staff requested.

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2 Q. Thank you. Now, shifting topics.
3 We're going to ask some questions about the customer
4 billing department. If you could turn to the
5 company's direct testimony panel at page 36. And on
6 page 36, specifically line 17 through 22. And the
7 panel can just let me know when it's ready to
8 proceed. And not to repeat too many times, but it's
9 direct. Page 36, line 17 through 22. How many FTEs
10 currently work in the customer billing department?

11 A. (Doane) For -- for that response,
12 we'd like to point you to the direct testimonies
13 Exhibit CEP 4, specifically the customer billing line
14 item and the number of employees.

15 Q. And that number is not changed as
16 you sit here today to the best of your knowledge.

17 A. I can't recite exactly that
18 number off the top of my head, but materially it has
19 not changed significantly.

20 Q. Thank you.

21 A. Yeah.

22 Q. Is the panel aware of any of
23 those FTEs are certified public accountants?

24 MR. FITZGERALD: Your Honor, I'm just
25 going to object to the relevance of that. There's

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2 been no indication that that was a requirement of
3 this position or any foundation laid to that effect.

4 MS. WHEELLOCK: And in response, Your
5 Honors, the IR I had mentioned earlier that was
6 included in William D. Yates original exhibit asked
7 a series of questions about forensic accountants. So
8 I am going off the line of questioning to ask the
9 company about plans with certified public
10 accountants.

11 MR. FITZGERALD: Your Honor, I -- I
12 believe that misstates that response, which refers to
13 conducting forensic audits, not forensic accountants.

14 MS. WHEELLOCK: And to clarify, I am
15 using it as a line of questioning to grow off of the
16 IR, Your Honors,

17 A.L.J. COSTELLO: Can you just clarify
18 first what their understanding is with respect to the
19 question that you made -- that was made in this IR
20 when you referred to forensic audits of customer
21 accounts and what their response was in saying that
22 they will receive training that will support the
23 audit of customer accounts? Let's make sure you're
24 both talking about the same thing.

25 MS. WHEELLOCK: Understood, thank you,

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2 Your Honors.

3 BY MS. WHEELLOCK: (Cont'g.)

4 Q. So turning back to the IR where
5 we did ask about whether or not the company was
6 planning to hire staff who could conduct forensic
7 audits, PULP sees forensic audits as like an enhanced
8 training, a capability to dive deeply into accounts
9 and conduct, you know, in depth review of arrears.
10 The company has since responded with the IR. Has
11 there been any changes to this response as you sit
12 here today?

13 A. (Hally) So Ms. Wheelock, I -- I
14 just want to make sure that I fully understand your
15 definition because you said enhanced training, the
16 ability to dig into the bills and really understand
17 the bills. And then you talked about forensic
18 accounting, which I think is a completely different
19 discipline. So I -- I just want to make sure that we
20 understand how you're defining forensic audit because
21 I'm not sure those two definitions are completely on
22 the same track.

23 MS. WHEELLOCK: Understood. And I'm --
24 I'm happy to move on Your Honors.

25 BY MS. WHEELLOCK: (Cont'g.)

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2 Q. So going back to the Customer
3 Experience direct testimony at page 36, line 17
4 through 22, can the panel please explain how the
5 customer billing department interacts with the
6 customer service representatives?

7 A. (Doane) So typically CSR would
8 extend or reach out to a customer billing technician.
9 If the situation arose where there was maybe
10 additional time required to do a complete analysis of
11 an account where, you know, the time went a lot for
12 that or to have that information when on the phone to
13 providing the resolution then and there. Or as I
14 stated earlier, if it were more of a complex nature,
15 an account that had more complexity similar to net
16 metering, CDG, value stack, and things of that
17 nature.

18 Q. And so just to clarify our
19 understanding. If a customer calls the company's
20 customer service line, they can't be directly
21 connected with the billing department.

22 A. That is correct.

23 Q. Thank you. Of the FTEs that work
24 in the customer billing department, are they
25 dedicated to that department or are they shared

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2 between different units or departments at the
3 company?

4 A. They are dedicated to the
5 customer billing function.

6 Q. So looking now at the next page
7 of your direct testimony, page 37, lines three
8 through nine, specifically line four, can you please
9 explain what the time period is for the bridge
10 period?

11 A. (Hally) So here we're defining
12 bridge period in traditional rate making terms. It's
13 that period of time between the test year and the
14 start of the rate year.

15 Q. Thank you. Is it the company's
16 intention with the 11 incremental customer billing
17 personnel for these personnel to be temporary or
18 permanent in the rate year?

19 A. Our intention is for them to be
20 permanent.

21 Q. Thank you. So now I'd like to
22 turn the panel's attention to pre-filed exhibit 108.
23 It's the company's exhibit to the filing CEP 1. And
24 we also have copies for the room if anyone would like
25 one, but it is a pre-filed exhibit 108. And

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2 specifically PULP will be asking questions about the
3 chart which is included, and again, it was Exhibit
4 CEP 1.

5 MR. HALLY: Your Honors, could I just
6 go get my reading glasses?

7 A.L.J. COSTELLO: Oh, certainly. Go
8 ahead.

9 MR. HALLY: Thank you.

10 A.L.J. COSTELLO: We'll just go off
11 the record a sec.

12 (Off the record 11:46 a.m.)

13 (On the record 11:47 a.m.)

14 MS. WHEELLOCK: For the record we're
15 looking at exhibit 108, specifically Exhibit CEP 1.
16 And when the panel is ready to proceed, you can just
17 indicate and I will ask my first question.

18 BY MS. WHEELLOCK: (Cont'g.)

19 Q. So the date in the upper right-
20 hand corner of this document, which is July 20th,
21 2023, does that mean that this document was produced
22 before the rate file?

23 A. (Campagiorni) Yes.

24 Q. And just for the record, PULP did
25 submit copies for the room. We highlighted the

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2 document, the company did not highlight the -- the
3 document, so I just wanted to flag that. And now
4 drawing the panel's attention to the right-hand side
5 of the page under what we have done to improve
6 performance. Looking at the first bullet point, what
7 is the status of the, a hundred additional team
8 members at the time of the rate filing?

9 A. Can I -- can I just ask you to
10 repeat it?

11 Q. Absolutely. So in this first
12 bullet point where it says that a hundred additional
13 team members were added, what is the status of those
14 hundred additional team members?

15 A. At what point in time today or at
16 the time we wrote this document?

17 Q. At the time of the filing. We'll
18 start there.

19 A. At the time of the rate filing,
20 which would've been about a week after, that number
21 would've been -- I think, pretty accurate, but
22 includes contractors that we had on property to help
23 us achieve stabilization.

24 Q. And so what does that number look
25 like now sitting here today?

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2 A. The exact number in doing a
3 reconciliation versus how many were internal
4 employees versus contractors? I -- I don't have that
5 right now at my fingertips.

6 Q. So at the end of that sentence,
7 it talks about a new billing group. Can the panel
8 please confirm whether or not this is the billing
9 department that was created in August, 2022?

10 A. It is.

11 Q. Moving now to the second bullet
12 point. At the time that the rate case was filed,
13 what was the status of these new 36 call center
14 personnel?

15 A. At the time of filing, we were in
16 the process of hiring additional customer service
17 representatives. I don't have an exact number.

18 Q. Understood. So is the company's
19 rate filing then looking to include any of the 36
20 that weren't hired at the time of the filing?

21 A. I would say the rate file
22 includes 33 of the 36 positions.

23 Q. Thank you. Moving now to the
24 last bullet point on the page, so under next steps.
25 Does the panel know how many regional open houses

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2 have been scheduled for the rate year?

3 A. So -- so just to clarify, are --
4 are you looking for the number of open houses we had
5 from July 1st of '23 to June of -- what we'll have up
6 to June of -- of '24? Is that what you're asking?

7 Q. So I was going to ask that next,
8 but why don't we -- why don't we go there first?

9 A. I don't want to give an incorrect
10 answer. So we know how many open houses we've done
11 and we have a number upcoming on the schedule. I --
12 you know, I don't want to reconcile it here right at
13 the table, but I -- we can give you that number of
14 how many open houses we've had with customers and
15 elected officials because we have done a number of
16 them, but I don't want to get my months wrong and
17 give you an incorrect answer at this time.

18 Q. Completely understood. So I
19 think, why don't we start with what you are able to
20 provide and we can go from there.

21 A. (Hally) Ms. Wheelock, is there a
22 specific part of our testimony that you're referring
23 to that might help us identify the number?

24 Q. Just one moment we'll be right
25 with you.

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2 A. (Campagiorni) And we do have some
3 testimony on page 46, line 11 of -- since December of
4 2022, Central Hudson has conducted nine open houses,
5 11 events held jointly with elected officials, and
6 participated in many other forms to meet with
7 customers in person and address questions about their
8 bills. And we could probably in the future get you
9 those other forms and detail them out as well if you
10 would like.

11 Q. Thank you. And just to end on
12 this topic again, to go to the original question, the
13 company is planning to continue regional open houses,
14 correct?

15 A. That is correct.

16 Q. All right, thank you. So
17 switching topics. Now we're going to go back to pre-
18 filed Exhibit 455, which was an inclusion of several
19 interrogatories that William D. Yates with PULP had
20 included in our direct testimony. So once the
21 company has Exhibit 455, which was handed out
22 earlier, you can flip it to the very back, very last
23 page, which is page 66 of 66. And the panel can
24 indicate when they're ready to proceed. So looking
25 at this interrogatory response, on average, how many

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2 hours a week does the average customer outreach
3 representative work for the company?

4 A. (Kopp) Full-Time employee, 40
5 hours a week.

6 Q. And looking at the interrogatory
7 response about the forecasted split in the customer
8 outreach staff's schedule, does the company have any
9 changes to make to that 60, 40 split today as you sit
10 here?

11 A. I am sorry, could you repeat your
12 question?

13 Q. Absolutely. So as you sit here
14 today and look at this interrogatory response, do you
15 have any changes to make to that 60, 40 percent split
16 in the customer outreach representative's time?

17 A. Not -- not at this time. It
18 really depends on the amount of cases -- PSC cases
19 coming in that determine how many hours we're working
20 on PSC cases rather than outreach.

21 Q. Thank you. So assuming that we
22 are in a -- a 60, 40 split. On average, how many
23 events is the customer outreach representative
24 expected to complete in that 40 percent?

25 A. There's no expectation. You

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2 know, some events are very short, we don't need to
3 spend much time, some are virtual, and then some of
4 the in-person events are -- are -- you know, take a
5 little bit more time.

6 Q. And can you clarify what kind of
7 trainings the customer outreach staff will be giving
8 in the rate year?

9 MR. FITZGERALD: Your Honor, I just
10 need to object as to the form, just clarity of -- of
11 trainings into whom.

12 BY MS. WHEELLOCK: (Cont'g.)

13 Q. So for clarity, with the customer
14 outreach staff, what kind of public trainings will
15 they be giving throughout the customer service
16 territory in the rate year?

17 A. (Campagiorni) I'm sorry. When
18 you say -- I -- I want to understand the question for
19 the -- when you say public trainings, what are you
20 referring to? I just want to make sure we're clear.

21 Q. Absolutely. This is where
22 customer outreach staff would be out in the public
23 training customers in a public setting.

24 A. And when you say training
25 customers, what do you mean about us training

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 customers?

3 Q. So I guess for my own clarity
4 then, does the company's customer outreach staff
5 offer trainings to customers?

6 A. Again, I -- I just want to
7 understand when you say do we offer trainings for
8 customers. Can you specify a little bit more what
9 you're asking. Are you asking if we train customers
10 on certain subjects? What -- what do -- what do you
11 -- what do you mean by that, I guess?

12 Q. So looking at your interrogatory
13 response on page 66, it does say that outreach --
14 there are outreach events and trainings. So if the
15 company could clarify what kind of trainings then
16 that the outreach -- outreach staff gives.

17 A. (Kopp) In the IR response. The
18 trainings that we refer to -- to are more internal
19 trainings for our staff. Customer trainings, we
20 don't call them trainings. We like to think of it
21 more of outreach education, customer education, our
22 presentations that we do.

23 Q. Thank you. So now I'd like to
24 turn the panel's attention to an interrogatory that
25 we filed with the company. Theresa, if you're ready.

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2 It's PULP Set 7 IR-43. This has not been previously
3 marked for the record, so we'll give Theresa Hotte a
4 moment to hand it out. And so to provide an
5 explanation, this packet is three pages long. Page
6 one has not been marked yet for identification, it's
7 PULP Set 7 IR-43. But for efficiencies, we did
8 include an IR response attached to this document,
9 which was moved into the record last week and is now
10 Exhibit 495, which represents DPS Set 16 IR-516.

11 A.L.J. COSTELLO: Okay. So at this
12 time we will mark PULP-7 IR-043 as Exhibit 564 for
13 identification.

14 BY MS. WHEELLOCK: (Cont'g.)

15 Q. And is the panel familiar with
16 this Exhibit 564? Yeah, it's the first page,

17 A. (Doane) Yes.

18 Q. And do you have any changes to
19 make this response as you sit here today? And just
20 to repeat the question was if there were any changes
21 to Exhibit 564 that you would make as you sit here
22 today?

23 A. Okay. Thank you. We're ready.

24 Q. Okay. So looking now at exhibit
25 495, can the company please explain what the

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2 discretionary customer credit is?

3 A. Yeah, we'd -- we'd like to refer
4 to our Response A and the -- starting with the second
5 sentence.

6 Q. Thank you. Earlier this morning
7 during my examination as well as with my colleagues,
8 there was a discussion about the company's plans for
9 enhanced training materials. Is the company looking
10 to do anything in the rate year in regards to
11 enhanced training materials for discretionary
12 customer credits?

13 A. (Campagiorni) The panel is not
14 aware specifically if it is included in one of the
15 modules for the enhanced training, so we don't know
16 is the answer to this question.

17 Q. Okay. Thank you. In the rate
18 year is the company looking to expand, which customer
19 representative types are able to offer discretionary
20 customer credits?

21 A. Can you just clarify when you say
22 -- can you ask the question, customer representative
23 types?

24 Q. Yeah. Happy to clarify. So is
25 the company looking at all to expand who can offer

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2 discretionary customer credits beyond contact center
3 representatives or customer outreach employees?

4 A. Yeah, generally those -- those
5 discretionary credits are reserved too. I would say
6 those two classifications as we identified in our
7 response.

8 Q. Thank you. As identified in the
9 response, who qualifies as a supervisor for approving
10 discretionary customer credits?

11 A. (Doane) So that's a specific role
12 that we have in the contact center, which would be a
13 contact center supervisor.

14 Q. And how many customer contact --
15 I'm so sorry. I don't want to repeat the title, but
16 the one you just said.

17 A. Sure.

18 Q. How many does the company
19 currently have?

20 A. Yeah, currently at this time we
21 would have six supervisors, but then I'd also like to
22 add the directors in that same department, which
23 would be two. So we'd have a total of eight.

24 Q. Thank you. And do those two
25 directors have specific titles by any chance?

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2 A. Director of customer contact.

3 Q. Right. Thank you. On an annual
4 basis, does the company have a cap on the total
5 amount of discretionary customer credits that can be
6 provided to customers?

7 A. No.

8 Q. For individual customers who
9 receive discretionary customer credits, is there a
10 cap from the company on how much an individual
11 customer can receive?

12 A. There are guidelines. I don't
13 have them all to recite to you right now, but we do
14 have guidelines for our representatives.

15 Q. And can you just further explain
16 what these guidelines are? Are they in training
17 materials?

18 A. (Ryan) I would say they're --
19 they're in correlation to the -- the IR response of a
20 10 percent discount which may be adjusted higher or
21 lower depending on individual circumstances.

22 Q. And is the company looking to
23 make any changes to that general policy in the rate
24 year?

25 A. (Hally) No.

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2 Q. How are the discretionary
3 customer credits reported to the Department of Public
4 Service?

5 A. So the panel is not aware of any
6 specific reporting requirements associated with
7 discretionary credits.

8 Q. Thank you. Is the company
9 forecast that there will be any general increase of
10 the use of discretionary customer credits in the rate
11 year?

12 A. Ms. Wheelock, I just would like
13 to clarify your question. When you say increase
14 relative to what?

15 Q. So relative to the use before the
16 filing of the rate case, do you expect that customer
17 service representatives will generally increase the
18 total amount of discretionary customer credits in the
19 rate year?

20 A. So again, because I am a very
21 specific individual, I guess, when you say relative
22 to before the filing, are you talking about the test
23 year, a calendar year specifically?

24 Q. Let's do test year.

25 A. I think what is in the rate year

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2 is beyond the scope of this panel.

3 Q. Can the panel explain if the
4 discretionary customer credits are rate based or are
5 they provided by shareholder funds?

6 A. So the answer to that question is
7 it depends on the time period in which they're
8 incurred.

9 Q. Thank you. When a customer
10 receives a discretionary customer credit, what are
11 the different means of communication used with the
12 customer?

13 A. (Ryan) Discretionary credits may
14 be discussed with the customer by phone or by email.
15 Once the credit is applied, it would appear on their
16 statement.

17 Q. And when the credit hits the
18 statement, what language is used to tell the customer
19 they've received such a credit?

20 A. It would be under the billing --
21 the payments and adjustments section of the bill and
22 it would say miscellaneous adjustment. I think it
23 says miscellaneous adjustment credit.

24 Q. So just to clarify, the customer
25 does not receive a separate letter or email

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2 indicating that they've received the discretionary
3 credit?

4 A. Not necessarily. We have sent
5 letters as a follow up. Generally, it's within the
6 conversation or the email with the customer.

7 Q. Okay. Thank you. I'm going to
8 move now to another topic.

9 A.L.J. COSTELLO: Ms. Wheelock, may I
10 just interrupt for one second. Can we go off the
11 record for one second?

12 (Off the record at 12:14 p.m.)

13 (On the record at 12:25 a.m.)

14 A.L.J. COSTELLO: And I just remind
15 the panel that you're still under oath. Ms.
16 Wheelock?

17 MS. WHEELLOCK: Thank you, Your Honor.
18 I just have two quick cleanup matters. Firstly, we
19 had identified PULP 564 for identification, which was
20 PULP Set 7, IR-43. I just would like to ask that,
21 that be moved into the record.

22 A.L.J. COSTELLO: Okay. Central
23 Hudson, any objection?

24 MR. FITZGERALD: No objection, Your
25 Honor.

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2 A.L.J. COSTELLO: Okay. We'll move
3 Exhibit 564 into the record.

4 MS. WHEELLOCK: Thank you.

5 BY MS. WHEELLOCK: (Cont'g.)

6 Q. One last question on
7 discretionary customer credits, and I'm going to
8 switch topics. But previously the panel had
9 mentioned that whether discretionary credits are
10 funded by rate payers or shareholders dependent on
11 the time period in which they're incurred. Can you
12 please elaborate on that response?

13 A. (Hally) I think the answer you're
14 looking for is included in the IR response to staff.
15 IR-516 or Exhibit 495, if you look at item D.

16 Q. And I'm sorry, did you say item
17 D?

18 A. Yes. Sub part D. So if -- if
19 you look there, and I -- I don't want to read the
20 whole answer, but I'll --

21 Q. No worries.

22 A. Central Hudson has provided
23 discretionary credits for many years. They've
24 historically been included in revenue requirements
25 and are treated as such. And the measurement of

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2 shared earnings, so again, within the rate year,
3 depending on the amount of discretionary credits
4 provided.

5 Q. Thank you. So now we'll switch
6 topics. If you could turn back to your direct
7 testimony page 19. So again, this is direct
8 testimony, page 19, lines five through seven. So
9 page 19, lines five through seven where it says
10 continue outreach and education efforts. Is the
11 company looking to do any enhanced outreach to EAP
12 customers in the rate year

13 A. (Campagiorni) When you say
14 enhanced, just what -- what are you thinking about
15 when you say that?

16 Q. So beyond continued. So from
17 what the company is already doing in relation to
18 outreach to EAP customers, is there anything new the
19 company is looking to do in the rate year? And if
20 so, what?

21 A. (Kopp) Could -- could you repeat
22 just so I can make sure I answer properly?

23 Q. Absolutely. So looking at the
24 rate year, is the company looking to do any
25 additional outreach to EAP identified customers?

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2 A. Yes. That would be the short
3 answer. It's going to depend on our staffing because
4 consumer outreach handles PSC complaints along with
5 outreach. We really have a goal to increase our
6 outreach to EA -- our EAP community. It's going to
7 depend on if we can get more staff to handle PSC
8 complaints and -- and increase outreach efforts.

9 Q. So with the plan to potentially
10 do more outreach events specifically or materials to
11 EAP identified, is there anything in the company's
12 plan to specifically create materials to help EAP
13 customers with potential bill increases?

14 A. I'm sorry. Could you repeat
15 please.

16 Q. Absolutely. So with the
17 company's plans to potentially do specific outreach
18 to EAP customers, of that plan, is there anything in
19 the works to specifically assist EAP customers with
20 bill increases?

21 A. At this time, we do not have any
22 plans for additional information. We've revamped all
23 of our communication for EAP customers for outreach
24 within the last year. I -- I don't have any plans to
25 update further at this time.

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2 Q. And with those updates, just to -
3 - to clarify, would those include translations for
4 multi-language individuals?

5 A. I -- I'm not able to answer that
6 right now.

7 Q. I'm just pausing for a moment to
8 see if that's the panel's answer or if I should
9 expect a follow up.

10 A. (Hally) Yeah, just one minute.
11 We apologize.

12 Q. No worries. Thank you.

13 A. (Kopp) That -- that's the panel's
14 answer.

15 Q. Okay.

16 A. Thank you.

17 Q. Moving on to our last topic. So
18 it's already been entered into evidence as Exhibit
19 514, but we do have copies for the room. This was
20 the stipulation regarding billing reporting
21 requirements. And so specifically with exhibit 514,
22 if you can turn to page four. I'm going to start my
23 line of questionings with subpart five, so please
24 feel free to take a moment to familiarize yourself
25 and let me know when you're ready to proceed. So in

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2 line two, can the panel please explain who are other
3 interested parties for sake of subpart five?

4 A. (Hally) So the company stipulated
5 to this, but this wasn't our proposal. Our
6 understanding of this proposal is that other parties
7 would include parties to this rate proceeding.

8 Q. Thank you. In subpart six, where
9 it says the company will track and report any
10 customer inquiries made directly to the company,
11 would that include inquiries by third parties such as
12 PULP to the company on behalf of the customer?

13 A. So Ms. Wheelock, I -- I just
14 want to make sure we understand how you're defining
15 inquiries here.

16 Q. So inquiries in PULP's belief
17 would be any sort of question, either through phone,
18 or email, letter to the company.

19 A. So I think here this stipulation
20 defines it as customer inquiries made directly. And
21 that is what the company is looking to track and
22 report. We're not looking at all third-party
23 contacts that come through any channel that -- that
24 would be very different than how our processes work
25 today.

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2 Q. And so could you clarify then
3 what forms of communication you would be tracking
4 then, for instance, phone, email directly from the
5 customer.

6 A. (Campagiorni) So in this context,
7 I think inquiries would be through voice calls into
8 our contact center, routed through kind of our RVR
9 and the channels we have set up there.

10 Q. Does the panel believe it would
11 include direct outreach events where staff are out in
12 the field working with customers?

13 A. I think the -- the outreach
14 department does track PSC complaints, escalated
15 complaints, issues regarding those PSC complaints.
16 Inquiry throws me off a little bit just because if
17 you're at an event with us and you asked the question
18 about x, y, or z I -- I don't think we would have a
19 formal reporting on that.

20 Q. Thank you. Looking now at
21 subpart seven, is the panel aware of whether or not
22 the attestation would be filed on the company's
23 website?

24 A. (Hally) No. This does not
25 include filing directly on the custom -- on the

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2 company's website.

3 Q. Is the panel aware of whether or
4 not the attestation by the executive would include a
5 notarized signature?

6 A. We're not aware of that
7 requirement.

8 Q. When would the public expect to
9 have the company issue such an attestation?

10 A. (Campagiorni) We would file that
11 prior to beginning any residential terminations.

12 Q. And in the panel's opinion, who
13 are the executive level positions that could sign
14 such an attestation?

15 A. I may be one of them, I think.

16 Q. Besides you, are there others?

17 A. I would think the president and
18 CEO.

19 Q. What about CFO?

20 A. (Hally) Yes, but I don't think
21 we've made a determination of the exact executive
22 that would be signing that attestation at this point.

23 Q. And in your opinion, what would
24 happen to the attestation if the executive who signed
25 it left the company during the rate year?

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2 MR. FITZGERALD: Your Honor, that
3 would call for a legal conclusion as to the validity
4 of the attestation. I therefore object.

5 MS. WHEELLOCK: I'm happy to withdraw
6 the questions, Your Honors.

7 MR. FITZGERALD: Okay.

8 MS. WHEELLOCK: And that concludes the
9 PULP's cross-examination.

10 A.L.J. COSTELLO: Okay. Thank you.
11 With that, it's now 12:40. We are going to take a
12 lunch break for an hour and a half. So we'll come
13 back at 2:00 -- was that at 2:10? And remember that
14 you're under oath. So we'll go off the record at
15 this point and we'll come.

16 (Off the record 12:41 p.m.)

17 (On the record 2:11 p.m.)

18 A.L.J. COSTELLO: And just a reminder
19 that you're still under oath. We're continuing with
20 the cross-examination of Central Hudson's Customer
21 Experience Panel. And up next will be the Town of
22 Olive.

23 MR. STRAUSS: Good afternoon, Your
24 Honor. Good afternoon, the panel. Good afternoon,
25 my fellow parties Your Honors, we have some IRs that

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2 we would like to distribute and have put into
3 evidence, please.

4 A.L.J. COSTELLO: That's fine.

5 MR. STRAUSS: Thank you.

6 MR. FITZGERALD: Your Honor, can we go
7 off the record for one moment?

8 A.L.J. COSTELLO: Yes. We can go off
9 the record.

10 (Off the record 2:12 p.m.)

11 (On the record 2:14 p.m.)

12 A.L.J. COSTELLO: So, I just -- let me
13 just -- do you want the -- the bill that you have
14 attached before -- to the, I think it's Town of Olive
15 IR006? Is that what the bill --

16 MR. STRAUSS: Well, the bill -- I
17 would say we should call the -- the bill exhibit
18 whatever number you're up to, the bill itself. And
19 then the next IR would be another exhibit. And if
20 you wanted to put 13 and 14 together as an exhibit
21 because I'll refer them together when we talk about
22 them.

23 A.L.J. COSTELLO: Oh, no, we'll give
24 them each -- we'll give them --

25 MR. STRAUSS: Each of the five.

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2 A.L.J. COSTELLO: Right. So then
3 we'll do the -- the bill will be marked for
4 identification as Exhibit 565 with the understanding
5 that you're going to -- when you -- if it goes into
6 evidence and you file the exhibit with the secretary,
7 that you'll be doing that with recounted -- account -
8 - redacting the account numbers.

9 MR. FITZGERALD: Your Honor, can we go
10 off the record for one moment?

11 A.L.J. COSTELLO: Yep, sure. Off the
12 record.

13 (Off the record 2:16 p.m.)

14 (On the record 2:17 p.m.)

15 A.L.J. COSTELLO: All right. So the
16 Central Hudson bill, which is a nine-page document,
17 is marked for identification as Exhibit 565. Town of
18 Olive-2 IR-006 will be 566. IR-013 will be 567, IR-014
19 will be 568, IR-015 will be 569 and IR-010 will be 570.
20 Is that the bill that follows, is that an attachment
21 to IR-010.

22 MR. STRAUSS: No, it was as on IR-19,
23 so I would say it should be its own -- its own
24 exhibit, Your Honor.

25 A.L.J. COSTELLO: Okay. And that will

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2 be marked for identification as Exhibit 571.

3 MR. STRAUSS: And that's two pages,
4 Your Honor.

5 A.L.J. COSTELLO: That's a two-page
6 bill.

7 MR. FITZGERALD: Your Honor, on the --
8 in the IR-571, it says pages one of three, and I do
9 have page one, and I do have page three in the
10 handout, but I'm not seeing page two.

11 MR. STRAUSS: I believe the page two
12 is at the bottom of page one, and it's the -- the
13 tear off or the cutoff bill payments. I think that's
14 the way that Central Hudson does their bills. If you
15 look at the bottom of the second page.

16 MR. FITZGERALD: Thank you.

17 A.L.J. COSTELLO: Okay, you may
18 proceed.

19 CROSS EXAMINATION

20 BY MR. STRAUSS:

21 Q. Thank you, Your Honor. If I
22 could ask the panel to look at the first exhibit, the
23 bill for the period from October 20th, 2023 to
24 November 16th, 2023. Do you recognize this bill
25 previously provided to you as Town of Olive T00-5?

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2 A. (Hally) So we recognize this as a
3 bill. We -- we don't have the complete TOO-5 in front
4 of us, so I -- I have nothing to compare it against,
5 but I do recognize it is a bill.

6 Q. Great. Thank you. If you look
7 at page nine of nine under the heading account
8 summary, you'll see 11 lines marked adjustment.
9 Please keep that account summary in your mind. I'd
10 now like to take a slight diversion to your direct
11 testimony filed on July 31st, 2023, page 10, lines 19
12 and 20. Please tell me when you're ready.

13 A. We're ready.

14 Q. Okay. So page 10 says that
15 percentage of bills requiring adjustments is near 3
16 percent and has shown significant improvement from
17 its peak of approximately 10 percent. Is that
18 correct?

19 A. That is what the testimony
20 states.

21 Q. What would that percentage be, or
22 rather is that 3 percent in relation to the number of
23 bills sent out by Central Hudson?

24 A. That percentage reflects the
25 total number of adjusted bills over the total bills

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2 sent out in that time period.

3 Q. Thank you. What would that
4 percentage be if it was based on the bills -- the
5 amount of the bills requiring adjustment divided by
6 the total amount of the bills sent out by Central
7 Hudson. And the reason I'm asking the question is to
8 understand whether the more complex and larger bills
9 tend to be the ones that are subject to adjustment.

10 A. Could you repeat that question,
11 please?

12 Q. Sure. So what would the
13 percentage that's referred to on page 10 lines 19 or
14 20 of your direct testimony as bills requiring
15 adjustments is near 3 percent, what would that
16 percentage be? If the amount of the, the bills
17 requiring adjustment, the dollar amounts of the bills
18 requiring adjustment was compared to the dollar
19 amounts of total bills. And the reason for asking is
20 to find out whether or not there's awaiting for bills
21 requiring adjustment based upon size of accounts,
22 dollars, et cetera.

23 A. So the panel does not have the
24 information necessary to calculate that metric.

25 Q. So can I ask a slightly more

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2 general related to that. Is -- is the 90/10 rule as
3 sort of the general rule or the 80/20 rule generally
4 applicable here, such that 10 percent of the number
5 of bills make up 90 percent of billings and that the
6 adjustments also fit the 90/10 or the 80/20 rule? So
7 would that be a -- a fair estimation that the -- the
8 adjustments would be related to the larger bills and
9 also that they would fit some kind of a 90/10 or 80/20
10 ratio?

11 MR. FITZGERALD: Your Honor, I am
12 going to object to that. First off, as to the rules
13 that he's referring to 80/10, 80/20, 90/10, whatever
14 they are they're not specified sufficiently or with
15 clarity for the panel to be able to respond.

16 A.L.J. COSTELLO: Can you just
17 rephrase your question?

18 BY MR. STRAUSS: Cont'g.)

19 Q. Sure, Your Honor, I'm trying to
20 get at the question related to the dollars amounts of
21 the bill and whether Central Hudson has a general
22 rule that it thinks of with respect to its billings
23 whether or not, for example, 10 percent of accounts
24 make up 90 percent of dollar revenues or something
25 similar to that so we've got a sense for the scale of

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2 the adjustments that we are talking about here in
3 terms of dollars and also the scale of the larger
4 accounts versus smaller accounts.

5 A. (Hally) I apologize that panel
6 does not have the information to conduct that
7 analysis on the stand here today.

8 Q. Okay. Thank you. So going back
9 to the bill referenced as Town of Olive T00-5 and the
10 next page so that's the town of Olive IR06. You
11 stated that the sum of the items described as
12 adjustments on page nine of nine of the bill is
13 \$253.35. Is that still your testimony?

14 A.L.J. COSTELLO: We don't have
15 testimony on that. Is there some testimony that you
16 want to point to?

17 MR. STRAUSS: Sorry. You're right,
18 Your Honor. That was the response to an IR.

19 A.L.J. COSTELLO: Okay. And these IRs
20 are, you know, they're not in evidence yet.

21 MR. STRAUSS: This is the one we're
22 talking about, Your Honor. You called it Exhibit
23 566. It's IR06.

24 A.L.J. COSTELLO: Right, which has
25 been marked for identification. Okay, so I'm sorry.

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2 Just please state your question again.

3 MR. STRAUSS: So the question was, is
4 the response to the IR6 that the total of the
5 adjustments which are on page nine of nine of the
6 bill immediately prior, 253.35, is that correct?

7 MR. FITZGERALD: Your Honor, I don't
8 believe that the panel has a calculator in front of
9 them to add up the columns to reach the totals that
10 are identified there.

11 MR. STRAUSS: Counsel, I believe that
12 your client put together the response in IR-6, which
13 came to the total of 253.35.

14 A.L.J. COSTELLO: Just one second.
15 Let me just go off the record. One second.

16 (Off the record 2:27 p.m.)

17 (On the record 2:28 p.m.)

18 BY MR. STRAUSS: (Cont'g.)

19 Q. So the question was the total of
20 2503.35 on IR-06, that's the total adjustments on page
21 nine of nine under account summary. Is that correct?

22 A. (Hally) I think that is how the
23 IR was answered, and we are not changing our response
24 to the IR at this time.

25 Q. Very good, thank you. So the

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2 total of the bill on page one of the bill is
3 2,325.57. So the adjustments of 253.35,
4 approximately what percentage do those adjustments
5 bear to the total of the bill without needing a
6 calculator to calculate?

7 A. (Campagiorni) So, Mr. Strauss,
8 I'm not sure what you're getting at, but I mean the -
9 - the 253.35, you're looking for that amount as
10 compared to the bill on page one on the total?

11 Q. Yes, please.

12 A. Yeah. So 10 percent roughly.

13 Q. Roughly. Very good, thank you.

14 Now moving on to the next two pages, IRs 13 and 14,
15 there were two adjustments related to a subaccount on
16 page nine. The subaccount is number 21 -- this is
17 all in IR 13 210000943908. And those subaccounts
18 adjustments were 419.42 and 0.98. And in IR 14, you
19 say that you agree that the total of such adjustments
20 is 420.40, is that still your testimony -- sorry, I
21 shouldn't say testimony. That's still the response
22 to the IR.

23 A. (Hally) So I believe you're
24 referring to the response to IR-14 where the company
25 said yes, that that is the total.

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2 Q. Correct. Thank you. And the
3 next IR-15, you agree that the calculation that the
4 percentage, that the 420.4, the adjustments for that
5 account bears to the total bill is 18.1 percent.
6 That's correct?

7 A. So I think at the time we did
8 have a calculator, but we did calculate that the 420
9 in relation to the -- to the total on IR-015 is
10 approximately 18.1 percent, yes.

11 Q. Great, thank you. So if the
12 recipient of this bill was to receive this bill and
13 see either the adjustments in total as compared to
14 the total bill or the adjustments for a sub-account
15 as compared to the total bill, they would not have
16 any detail on what those adjustments are for some
17 number between 11 and 18 percent of the bill. Is
18 that fair? based on what we've just gone through?

19 A. So could I ask you to -- to maybe
20 rephrase and -- and shorten that question just so
21 that we can ensure we're answering the right
22 question?

23 Q. Sure. So my question is, the
24 recipient of this bill sees a list of 11 adjustments
25 on page nine, two of which are related to one sub-

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2 account and as we've discussed, those adjustments
3 make up 18 percent of the total bill. And in total
4 the adjustments, some positive, some negative make up
5 11 percent of the bill. Is it fair to say that that
6 recipient of the bill would not know what those
7 adjustments are for amounts billed by Central Hudson
8 of between 11 and 18 percent of the bill?

9 A. (Doane) Thank you. Specific to
10 your comment, the -- the customer I'm actually
11 referring to page nine of nine that does list the
12 account summary. It is accurate that that customer
13 has the information that's presented, which aligns a
14 line-item titled adjustment with a specific amount
15 and the associated account. And that is the only
16 detailed information provided on this summary bill.

17 Q. So, I'm sorry, could you be more
18 specific with respect to the adjustments versus the
19 sub-accounts?

20 A. So the adjustments you -- you're
21 asking about the details, would a customer lack
22 detail, the only information that would be presented
23 to them is what's displayed on the account summary on
24 page nine of nine. There is no additional detail to
25 that amount.

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2 Q. So to go back to my question
3 then, it is accurate that the custom would not be
4 able to tell what some number between 11 percent and
5 18 percent of the bill is that Central Hudson's
6 rendered to them.

7 A. (Campagiorni) I think for this
8 specific example you're presenting, that's accurate.

9 Q. Great. Thank you. So when do
10 you expect that customers receiving bills such as
11 these will be able to discern their accuracy to
12 degrees that are more accurate than the ones we've
13 just talked about?

14 A. Yeah, I -- I think in our
15 response to Town of Olive to IR-10 our response has it
16 in there.

17 Q. Okay. I was going to get to that
18 next, which is good. So if that's the case, when you
19 say development is in progress, when do you expect to
20 have progress such that all the customers will be
21 able to understand all the elements of their bills?

22 A. I don't think anyone on this
23 panel here has exact dates on, on those items right
24 now.

25 Q. Okay, thank you. So in the rate

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2 case and for the, I believe you're requesting an
3 electric revenue increase total, that's delivery and
4 supply of 13 percent, and given the degree of
5 accuracy applied by the bill we've just reviewed,
6 which has unexplained adjustments totaling 11 to 18
7 percent of the bill, is it possible that customers
8 could in future be facing actual rate increases of
9 both of those numbers from 24 to 31 percent across
10 the board for electric?

11 MR. FITZGERALD: Objection, Your
12 Honor. That's argumentative and also calls for
13 speculation.

14 A.L.J. COSTELLO: Can you just state
15 that one, state it again so I can?

16 MR. STRAUSS: Sure. The question was
17 that given that Central Hudson is requesting electric
18 revenue increase in total of 13 percent, and the
19 degree of accuracy implied by the bill that we've
20 just reviewed, has unexplained adjustments totaling
21 11 to 18 percent, is it possible that customers could
22 be facing actual rate increases of a combination of
23 the 13 percent that's being proposed, plus 11 percent
24 to 18 percent, or a total of 24 to 31 percent?

25 A.L.J. COSTELLO: I don't understand -

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2 - I don't understand the question. I don't know --
3 do you understand the question? I mean, if -- could
4 I ask the panel if the panel understands the
5 question?

6 A. (Hally) Not fully.

7 A.L.J. COSTELLO: It is somewhat
8 argumentative. So can you just try to break it down
9 maybe?

10 MR. STRAUSS: Sure. Not intended to
11 be argumentative, Your Honor, but more to understand
12 what customers such as this could be facing to the
13 extent that they have unexplained adjustments on
14 their bill already.

15 A.L.J. COSTELLO: Can you use this
16 bill at -- the bill that's in front of them, can you
17 use this as your starting point?

18 MR. STRAUSS: Sure.

19 A.L.J. COSTELLO: And then -- and use
20 that and maybe ask a hypothetical if there's an
21 increase.

22 MR. STRAUSS: Right, exactly. So to
23 the extent that the customer has unexplained
24 adjustments on this bill of 11 percent of the bill,
25 and so it's possible that from the customer's

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2 perspective their bill should be 11 percent lower
3 than the amount that was provided. That customer is
4 now looking at a 13 percent increase on top of that
5 bill that was just provided. So the customer might
6 be looking at what could actually be a 24 percent
7 rate of increase. That's my question is, is that
8 hypothetical, as Your Honor said, is -- could that
9 customer be actually looking at a 24 percent rate of
10 increase, the 11 percent adjustments plus a 13
11 percent proposed rate increase?

12 A.L.J. COSTELLO: Do you want -- I
13 still -- I'm sorry. Central Hudson, is there any --
14 do you have any objection to this question or is this
15 question okay with you?

16 MR. FITZGERALD: Your Honor, I
17 maintain the objection one, one as to the fact that
18 it's ambiguous and I can't figure out what it's --
19 it's going to. And two, the defendant is talking
20 about rates, it seems completely misdirected to this
21 panel. It's not a revenue requirement panel, nor is
22 it adjusting the actual rates on the bill. So, the
23 rates --

24 A.L.J. COSTELLO: Can you -- I mean,
25 this should be tied back to their testimony.

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2 MR. FITZGERALD: Yes. And I don't --
3 I don't see any link back to their testimony. So
4 again, it's also a question of irrelevant and beyond
5 the scope.

6 A.L.J. COSTELLO: And I agree with --
7 can you tie this back to their test -- the specific
8 testimony, instead of asking them the implications on
9 rates, they're -- they're not here to talk about, you
10 know, the raises and rates.

11 BY MR. STRAUSS: Cont'g.)

12 Q. Right. We can move on, Your
13 Honor. Let's move on to the next bill, which is the
14 last exhibit that I've requested be placed in
15 evidence. Do you recognize this bill that was sent
16 to you as an IR as a Town of Olive IR 9?

17 A. (Hally) I think again the panel
18 recognizes it as a Central Hudson bill. But we don't
19 -- we have nothing to compare it to validate that it
20 is part of, you know, IR-19.

21 Q. Understood. So can we just look
22 at the bill itself. On page two of the bill, does it
23 provide actual meter readings on November 9th, 2023
24 and January 10th, 2024 of 73191 and 74880
25 respectively.

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2 A.L.J. COSTELLO: All right. I don't
3 mean to -- I'm sorry, I'm interrupting, but this is -
4 - you are -- you are referring to documents that are
5 not in evidence right now, and you're reading out of
6 documents that are not in evidence. Do you want
7 these moved into evidence?

8 MR. STRAUSS: Yes, please, Your Honor.

9 A.L.J. COSTELLO: Okay. Central
10 Hudson, do you have any objection?

11 MR. FITZGERALD: Your Honor, I do have
12 an objection as to the foundation for this particular
13 document, the one that's marked for identification as
14 live 71, it wasn't part of the panel's testimony.
15 I'm not sure what it relates to, and I'm not sure
16 what type of customer it involved.

17 A.L.J. COSTELLO: Do you have any
18 response to that?

19 MR. STRAUSS: It's -- also with
20 respect to incorrect current bills, and this is a
21 residential customer who provided this bill to us, as
22 you can see, the reading -- the meter reading date
23 was January 10th so this was just received by the
24 town of Olive from a resident of the town in the last
25 few days. And we have sent this to Central Hudson

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2 with an IR asking exactly the questions that I'm
3 going to ask today to -- and we're trying to
4 establish that there are still incorrect billings.

5 A.L.J. COSTELLO: The IR that you're
6 referring to is that -- is that outstanding? Is that
7 still waiting for a response?

8 MR. STRAUSS: It is still waiting for
9 response. It's -- the response is due today, Your
10 Honor.

11 A.L.J. COSTELLO: And the questions
12 that you're going to ask are the same questions that
13 you've asked in the IR?

14 MR. STRAUSS: Essentially Yes, Your
15 Honor.

16 A.L.J. COSTELLO: When you get the
17 response from the IR, can you not move that or seek
18 to have that entered into evidence?

19 MR. STRAUSS: Could I do that in
20 writing?

21 A.L.J. COSTELLO: Well, you -- you can
22 also -- you can first I think, discuss with Central
23 Hudson if they'll stipulate to it. So we can just do
24 it by stipulation once you receive the response.

25 MR. STRAUSS: I think, Your Honor, we

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2 could deal with it in a minute today and then be done
3 with it, but it's up to you.

4 A.L.J. COSTELLO: Well, I'm just -- I
5 have an objection that -- with respect to the bill.

6 A.L.J. MORENO: So if -- if you have
7 questions related to, to this bill, you would have to
8 first establish that this panel is familiar with it
9 enough to be able to respond to the questions. And
10 as I understand counsel's objection, it is that they
11 don't have a, a basis of understanding for this yet.
12 So if you can lay a foundation for their familiarity
13 with this to ask the questions, we can consider it,
14 but you've got to take it one step at a time.

15 MR. STRAUSS: Understood, Your Honor.
16 So I think Mr. Hally may have said that you are
17 familiar that this is a Central Hudson bill, or you
18 have not yet looked at this bill. As I said, the --
19 the IR was sent to you nine days ago.

20 A. (Hally) So I think my prior
21 response was, we do recognize this as a Central
22 Hudson Hudsonville. However, we -- we have not
23 responded to that IR at this time.

24 MR. STRAUSS: So then we could do, as
25 Your Honor suggests, and once we get the IR response,

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2 ask central Hudson whether they would stipulate to
3 including it in evidence.

4 A.L.J. COSTELLO: I think that would
5 be the -- the way to go. With respect to the other
6 exhibits, exhibits 565 to 570, I did not hear any
7 objection. And those exhibits will be moved into
8 evidence.

9 (Composite exhibits 565 through 560
10 admitted into evidence.)

11 MR. STRAUSS: Thank you, Your Honor.
12 If I -- I could ask the panel two further questions.

13 A.L.J. COSTELLO: Certainly, go ahead.

14 MR. STRAUSS: Do the total of your
15 electric bills and gas bills when total for a period,
16 say the year ending March 31st, 2023, the base year
17 for this rate case, do they represent the base level
18 of revenues from which you request a rate increase?
19 So in the electric rate case, you are requesting a
20 rate increase for the electric business of 13
21 percent?

22 MR. FITZGERALD: Your Honor,
23 objection, way beyond the scope of this panel.

24 A.L.J. COSTELLO: Can you tie this
25 back to their testimony?

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2 MR. STRAUSS: I'm trying, Your Honor,
3 to try it back to whether or not the base level of
4 revenues are accurate based on bills, and therefore
5 whether if there are unexplained adjustments on bills
6 that has an impact on whether the proposed electric
7 rate increase start with a fair base level. So it's
8 based on --

9 A.L.J. COSTELLO: Is this --

10 MR. STRAUSS: That was why my question
11 was whether the bills total added up equal the base
12 year revenues from which a rate increase is sought.

13 A.L.J. COSTELLO: Okay, I'll -- I'll
14 let you ask the question. It's -- I'm not sure that
15 it's with, this is the proper panel to do so, but ask
16 your question to see what the -- what the response
17 is.

18 MR. STRAUSS: Very good. Thank you,
19 Your Honor. So the question was do Central Hudson's
20 electric bills and gas bills when total for a period,
21 say the base year ending March 31st, 2023, represent
22 the base level of revenues from which you request a
23 rate increase in the electorate rate case, a rate
24 increase that you've requested at 13 percent?

25 A.L.J. COSTELLO: The -- the company's

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2 request or the panel?

3 MR. STRAUSS: Yes.

4 A.L.J. COSTELLO: Not the panel.

5 MR. STRAUSS: The company, exactly.

6 A. (Hally) Sorry, Mr. Strauss, that
7 is beyond this panel's testimony and expertise.

8 MR. STRAUSS: Okay. I think I have no
9 further questions. Thank you.

10 A.L.J. COSTELLO: Okay. Thank you.
11 Next will be Dutchess County.

12 MR. PAGE: Thank you. Your Honors.
13 Okay. I'd like to start the -- the examination.

14 MR. FITZGERALD: Excuse me, Mr. Page,
15 I think we're having a hard time hearing. Your mic
16 might not be on.

17 MR. PAGE: It's on.

18 A.L.J. MORENO: You might just have to
19 move it a bit closer to you.

20 CROSS EXAMINATION

21 BY MR. PAGE:

22 Q. Can you hear me now? Going to
23 the examination, I will only be referencing your
24 direct testimony, none of the rebuttal testimony. So
25 just as a general statement noting the -- the

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2 membership and background of the panelists, would you
3 agree that this is a well-educated, very capable,
4 competent, and experienced panel?

5 A. (Campagiorni) Thank you for the
6 compliment. I'm not sure how to assess that because
7 I don't know what you're judging us against.

8 Q. Well, don't say it's a compliment.
9 I'm not finished. Just say yes or a no.

10 A. I will say yes.

11 Q. Thank you. Thank you. Just as a
12 guess, how much of the experienced work that you do
13 on -- on average is devoted to regulatory compliance,
14 working on rate cases, populating, checking, issuing,
15 responding to, for example, billing and other
16 regulatory administration in general? And I'm not
17 looking for a number, just a sense, a little, a
18 moderate amount or a lot of time.

19 MR. FITZGERALD: Your Honor, I'm going
20 to object again, it's -- it's beyond the scope of
21 this panel as far as the specifics to what they
22 testified to. And it's not for the panel. Each of
23 these members have differing responsibilities when
24 they're not sitting on this panel. So there is no
25 one uniform, a number for that nor is it possible

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2 here today to try and total up the percentage of time
3 that each of these panel members allocate to each of
4 the identified and enumerated tasks.

5 MR. PAGE: But Your Honor, that wasn't
6 the question.

7 A.L.J. COSTELLO: Okay.

8 MR. PAGE: It's just a general sense
9 of things.

10 A.L.J. COSTELLO: But how does this
11 relate to their testimony? What -- what is it that
12 you're trying to get at by asking them this question?

13 MR. PAGE: Well, eventually what I'm
14 getting to is the -- the cost for some of the -- the
15 decisions, some of the work that goes on as part of
16 these cases that proceed in the -- in the state.

17 A.L.J. COSTELLO: So how much it costs
18 the company to put on a rate case or this portion of
19 the rate case. Is that what you're trying to get at?

20 MR. PAGE: I'm talking about
21 regulation in general.

22 A.L.J. COSTELLO: Okay. And -- and
23 how is that relevant to what -- what we have before
24 us in this case?

25 MR. PAGE: Okay. Let me move on to

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2 the next question.

3 BY MR. PAGE: Cont'g.)

4 Q. On page eight, lines two to three
5 of the direct testimony, would you agree that the --
6 the company's discussed the initiatives to enhance
7 customer service, including a transition to monthly
8 meter reading?

9 A. Yes. Within our direct
10 testimony, we do cover those topics.

11 Q. And on page 13, lines 11 through
12 13, would you agree that -- that Central Hudson has
13 evaluated and developed a plan to adjust its billing
14 practices to go to -- to monthly meter reading, thus
15 eliminating the -- the monthly billing estimates.

16 A. So your question had a few
17 components to it, and if -- if you want all of those
18 components answered, we, we just pulled out a few of
19 them, but if -- if you want to just ask it again, we
20 can just -- I just want to make sure I keep track.

21 Q. Okay. Did you develop a plan on
22 going to monthly meter reading?

23 A. Yes, we have. And we put forward
24 a plan within our direct testimony, and then we did
25 provide an updated plan.

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2 Q. And was that plan predicated on
3 eliminating alternate month billing estimates?

4 A. That plan will allow us to
5 eliminate alternate month billing estimates.

6 MR. PAGE: Okay. Then on again, on
7 page eight, line 17 through 20 did you indicate that
8 the transition to monthly meter reading is aligned
9 with customer sentiments?

10 MR. FITZGERALD: Excuse me, Mr. Page.
11 I'm -- I'm not seeing the page reference and the
12 number. Would you like to provide that to us?

13 MR. PAGE: Okay. So it's page eight
14 and it's lines --

15 A.L.J. MORENO: I believe it's
16 actually page 13, lines 17 through 20.

17 BY MR. PAGE: Cont'g.)

18 Q. Okay. And I stand correct. So
19 with that correction, does -- does that transition to
20 monthly meter reading align with residential customer
21 sediments?

22 A. (Hally) Yes.

23 Q. And does it show a preference for
24 monthly meter reads?

25 A. Yes. As stated in our testimony.

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2 Q. And does that show a
3 dissatisfaction with monthly -- with bimonthly reads,
4 or does it show a dissatisfaction with billing
5 estimates?

6 A. So, as written in our testimony,
7 it is a dissatisfaction with bimonthly billing
8 estimates.

9 Q. Again, using the -- the panel
10 testimony as -- as we've just been over, that the
11 customers are actually looking for a meter read as
12 opposed to an estimate.

13 A. Yes.

14 Q. And if you went with your
15 bimonthly reads, as opposed to giving estimates in
16 between just exclusively bimonthly reads and billing,
17 would that eliminate some of the -- the problems that
18 have developed into commission complaints,

19 A. Mr. Page, I think that is a
20 possibility. However, we -- we don't have an
21 analysis here in our testimony that states that

22 Q. Understood. Will going to the
23 monthly meter reads, will that require an integration
24 into the new CIS system?

25 A. (Campagiorni) The integration

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2 already exists, Mr. Page.

3 Q. Okay. So -- so there's no field
4 work, for example -- for example, when you go out and
5 read meters and you input that data, that's all
6 currently accommodated.

7 A. So the field system that we have
8 to read meters is already integrated with the SAP CIS
9 system.

10 Q. Okay. Finally, would it be
11 accurate to say -- state that moving to monthly meter
12 reads and billing is a costly endeavor, not only on a
13 monetary basis, but also on an operational --
14 operational or organizational basis, amounting to a -
15 - in monetary terms, to 4.4 million per year, which
16 is taken from page 14 line two of your testimony?

17 A. (Hally) Yes. So again, the 4.4
18 million is on page 14, line 11 of this testimony.
19 We've subsequently updated that plan and, and the
20 numbers have changed to some extent, but that's a
21 rough order of magnitude still.

22 Q. Okay. Moving on to another
23 general set of questions. On page 16, line six
24 through 13, is it correct that the company seeks to
25 implement a portfolio of projects in -- in the rate

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2 year ending June 30th, 2025?

3 A. So, Mr. Page correct. Within the
4 direct testimony of this panel, we did put forward a
5 portfolio of projects, however we've stipulated to
6 reducing the size of that portfolio.

7 Q. Okay. In that -- on page 16, you
8 indicate that, at least in your initial direct
9 testimony, that -- that that set of projects and
10 capital expenditures would cost about \$5.3 million.
11 So you're saying that's changed. Do you have an
12 estimate of what that's been reduced to?

13 A. If you'll just excuse us, we'll
14 take a look. I'm not sure we have the exact number
15 with us, but we'll take a look to see if we do. So
16 I'm sorry, Mr. Page, we don't have the number
17 directly in front of us, but it has reduced from this
18 dollar amount.

19 Q. Okay. Thank you. So those
20 initial projects were the interactive voice response
21 unit, the -- the IVR modern -- modernization of web
22 and mobile technology improvements for commercial
23 customers and -- and also a centralized notification
24 system. So in those three, what has changed?

25 A. So could you just maybe clarify

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2 what you mean by what has changed?

3 Q. Well, you indicate that you
4 modified the -- the implementation portfolio
5 projects. And -- and so there are three projects
6 listed in your direct testimony -- initial direct
7 testimony, and I'm just wondering what's been
8 modified that would reduce the capital expenditure
9 from 5.3 million to something less than that?

10 MR. FITZGERALD: Your Honor, there may
11 be some confusion here because we're working in the
12 direct testimony. I do note that there's a
13 stipulation regarding the customer experience capital
14 projects that is part of a negotiated settlement
15 component. These projects were changed and modified
16 and it's set forth in the stipulation, which I
17 believe has been entered into the record.

18 A.L.J. COSTELLO: As exhibit 516.

19 MR. FITZGERALD: Thank you, Your
20 Honor. Your Honor, I think it may be Exhibit 515.

21 A.L.J. COSTELLO: This is for electric
22 capital and operations. Is that?

23 MR. FITZGERALD: No, Your Honor. This
24 one is actually titled Stipulation Regarding Customer
25

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2 Experience Capital Projects.

3 A.L.J. MORENO: Yes, that's right.
4 It's 515.

5 MR. PAGE: Are you answering my
6 question?

7 A.L.J. COSTELLO: Do you have -- do
8 you have access to Exhibit 515?

9 MR. PAGE: Well, I'm just referring to
10 the response that that came from the panel. And they
11 said that, that the -- that this request has been
12 modified to reduce it from the 5.3 million

13 A.L.J. COSTELLO: Which is set forth
14 in Exhibit 515.

15 MR. PAGE: Well, that's what counsel
16 said, but not the -- the panel.

17 A.L.J. COSTELLO: Okay. Let's see
18 what the panel has to say.

19 BY MR. PAGE: Cont'g.)

20 Q. And -- and I think I know that --
21 that from the stipulation agreement, you said that
22 part of the -- the customer web and mobile technology
23 would -- would be at least deferred to some other
24 time in the future.

25 A. (Hally) I believe that's the

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2 case, and I would also agree with -- with counsel
3 that the stipulation has that information in it, and
4 we do not have that stipulation in front of us as a
5 panel.

6 Q. Okay. Let me -- let me move on
7 and ask the question of the remaining projects, will
8 they have to be integrated into the CIS system?

9 A. That there will likely be some
10 level of integration with the SAP system?

11 Q. Question, would it possibly be
12 more appropriate to wait for that system to have
13 become stable prior to adding new systems into an
14 existing system that's in its the last phase of its
15 development?

16 MR. FITZGERALD: Your Honor, I'll
17 object that that's beyond the scope of this
18 particular panel and their expertise as to the SAP
19 system.

20 A.L.J. COSTELLO: That's sustained, if
21 you can point to something in their testimony that
22 refers to the SAP system and their knowledge of that.

23 MR. PAGE: Okay. I'll move on to the
24 next question, Your Honor.

25 BY MR. PAGE: Cont'g.)

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2 Q. On pages 19 and 20 lines 18
3 through 23, on page 19 and one through seven on 20,
4 do you reference the -- the EAP program requiring an
5 annual review of monthly -- monthly bill discounts?
6 I will take that as a yes because it's in the
7 testimony.

8 A. (Hally) Sorry. We see the
9 section of testimony you're talking about. I was
10 waiting for a question.

11 Q. Well, the -- the -- the question
12 is does that call for a monthly review of bills, the
13 billing discounts rather?

14 A. So as stated there, requires an
15 annual review of monthly bill discounts, yes.

16 Q. So again, and you indicate that
17 the that these programs will reach their 2 percent
18 cap in the rate year. Is that accurate?

19 A. So that is accurate under the
20 company's proposal, but we'll point back to the
21 development of that and that information within the
22 forecasting and rates and revenue requirements panels
23 as it states on the bottom of page 19.

24 Q. Okay. Would -- would you agree
25 that these amounts are significant amounts, 20.3

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2 million for electric and 5.3 million for gas?

3 A. So I think those types of
4 comparisons are all relative. I think from a pure
5 dollar amount, it depends on who you ask but, you
6 know, that level of millions of dollars seems
7 significant. But I would point you back that there
8 is the 2 percent cap for the total program. So it is
9 relative and could be a subjective assessment as to
10 whether or not it's significant.

11 Q. Okay. Would you agree that those
12 amounts in the revenue requirements in your rates,
13 will be charged to all Central Hudson customers for
14 payment in some fashion based on their -- their rate
15 schedule?

16 A. So that -- how that would be
17 allocated is beyond the scope of this panel?

18 Q. I'm not -- I'm not speaking about
19 how it would be allocated. I'm just asking will it
20 be allocated to customers?

21 MR. FITZGERALD: Your Honor, I'm going
22 to object again. I believe one of the panels asked
23 and answered this question that they're not the panel
24 that does the development of rates and the rate
25 allocation across the different customer classes.

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2 And this question really does ask to how certain
3 costs that are being incurred would be allocated
4 across to rate classes.

5 MR. PAGE: I understand, I'm not
6 asking how they'd be allocated across rate classes.
7 I'm just asking will those costs in some fashion be
8 assigned to rate -- the rate schedules for those
9 classes? And in other words --

10 A.L.J. COSTELLO: So basically you --
11 you just want to know if the cost for the EAP program
12 during the rate year will be born by rate payers as a
13 whole?

14 MR. PAGE: Exactly.

15 A.L.J. COSTELLO: Okay. Now, whether
16 that's with it, you know, that's not something that
17 they've testified to. I don't know if it's something
18 that you're capable of responding to.

19 A. (Hally) So I think we can limit
20 our response to say it would be borne by rate payers.

21 MR. PAGE: Okay. Now, in regard to
22 the -- the EAP and I guess this is on the verge of
23 going beyond your -- your capability, but let me --
24 let me state it anyhow and then you can object to it,
25 if appropriate. Do these pay payments cover the

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2 amounts in billing that the EAP customers end up
3 paying to support the revenue requirements accruing
4 from the CLCPA mandates?

5 MR. FITZGERALD: Your Honor, I think
6 that particular question is vague and ambiguous and,
7 in some ways, misleading. So I do object as to the
8 form

9 A.L.J. COSTELLO: That's sustained.

10 MR. PAGE: Okay. Is there any
11 correlation between the investments in DACs and
12 helping customers within the DACs pay their electric
13 and natural gas energy bills?

14 A.L.J. COSTELLO: And I'm just --
15 sorry. Is there anything in the testimony that you
16 can refer them to?

17 MR. PAGE: Well, it's the customer
18 experience panel and as I recall, they did indicate,
19 you know, a percentage of what they're collecting
20 under the CLCPA or expending under the CLCPA is going
21 to the benefit of DACs.

22 A.L.J. COSTELLO: Okay. And just your
23 question once -- once again, what was the question?

24 MR. PAGE: The question is, is there
25 any correlation between the investments in the DACs

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2 and helping customers located within the DACs pay
3 their electric and natural gas energy bills?

4 MR. FITZGERALD: Your Honor, I just
5 sustain my earlier objection.

6 A.L.J. COSTELLO: Okay. That's
7 sustained.

8 BY MR. PAGE: Cont'g.)

9 Q. Okay. Moving on to page 23,
10 lines two through 17, do you indicate that, that the
11 -- the number of PSC complaints are elevated?

12 A. (Hally) Yes, we do indicate that.

13 Q. Do you also indicate that there's
14 no expectation that they will significantly diminish?

15 A. Mr. Page. Could you help us out
16 by just pointing to that reference?

17 Q. It's -- it starts out the -- the
18 PSC complaints, and now this is on, I guess, line
19 two, page 23. PSC complaints received by Central
20 Hudson remain elevated with no expectation that they
21 will -- that they will significantly diminish.

22 A.L.J. MORENO: And so, Mr. Page, what
23 was the follow up question regarding that?

24 MR. PAGE: Well --

25 A.L.J. MORENO: Whether that remains

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2 to be their testimony?

3 MR. PAGE: I was asking whether they -
4 - they still believed that.

5 A.L.J. MORENO: They had no
6 corrections to their testimony as I understood it.

7 BY MR. PAGE: (Cont'g.)

8 Q. Okay. Then the next question is
9 with -- with that as a -- a background. Is it not
10 reasonable to, in some fashion make attempts to -- to
11 in fact, look to diminish those complaints?

12 A. (Campagiorni) Can you clarify the
13 question Mr. Page?

14 Q. Sure. I mean, let me -- let me
15 pose it as another question. And the company has
16 referenced its strategic planning, and I assume all
17 members of Central Hudson are aware of your strategic
18 plans.

19 MR. FITZGERALD: Your Honor, that
20 statement, just because the question that will fall
21 from it, that assumes facts that are definitely not
22 in evidence as to who's aware of the strategic plan
23 of the company and it's not clear which strategic
24 plan the company has multiple.

25 MR. PAGE: Well, in the -- in the

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2 testimony and maybe it's the -- the policy panel
3 referenced as the company's strategic plans and
4 strategic planning.

5 A.L.J. MORENO: So with regards to
6 this panel, did you have a section of their testimony
7 or of particular plans? Could you rephrase, I think
8 counsel was objecting to the form of the question.

9 BY MR. PAGE: (Cont'g.)

10 Q. Okay. Let me see if I can
11 rephrase the -- the question. Okay. Should
12 consideration be given by the -- the company to set
13 an objective to be complaint free by some year, say
14 2050, and in effect, diminishing the -- the
15 expectation that that complaints would in fact
16 increase in the future?

17 A. (Hally) We haven't conducted
18 analysis to state exactly what a reasonable goal
19 would be within the timeline that you've put forward.
20 However, I would point you to page 15 of the
21 company's rebuttal testimony of the -- sorry, this
22 panel's rebuttal testimony. And in lines 11 --
23 starting at line 11, we do talk about the company
24 making extensive efforts to communicate with
25 customers on the component of electric and gas bills

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2 so that customers can actively manage their account
3 and be informed consumers, variable nature of supply
4 prices, other elements that may generate complaints
5 so we do talk about some of the activities that
6 company is undertaking and has done in the past to
7 resolve complaints, but also stop them from coming in
8 in the first place

9 Q. Again, to an extent then that
10 rebuttal testimony to an extent takes away from your
11 statement that -- that there's no expectation that
12 they will diminish the -- the PSE complaints will
13 diminish significantly in the future. I guess what
14 I'm saying is you're saying not completely different,
15 but you're taking two different positions.

16 MR. FITZGERALD: Your Honor, I have to
17 object to that as argumentative.

18 A.L.J. COSTELLO: Sustained.

19 BY MR. PAGE: (Cont'g.)

20 Q. Okay. On page 25, lines 10
21 through 12, the panel states that -- that
22 benchmarking will allow Central Hudson to measure its
23 performance directly against other utilities and
24 provide a basis for establishing performance
25 improvement goals. With that as a background, who

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2 knows more about the company performance than the
3 company itself?

4 A. (Hally) Mr. Page, is that your
5 question? Who knows more than us or?

6 Q. Yes.

7 MR. FITZGERALD: Your Honor, I will
8 object again, and I apologize, but I feel the need to
9 object that this panel cannot speak for the company
10 as a whole or the knowledge of the company as a whole
11 comparatively speaking. So again, it's asking the
12 panel a question about the company as a whole, or the
13 knowledge of the company as a whole, and sitting here
14 today, it's hard for them to answer that question
15 directly.

16 A.L.J. COSTELLO: Okay.

17 MR. PAGE: Except for the fact that --
18 that they make the statement benchmarking will allow
19 Central Hudson to measure, so they're speaking for
20 the company in that regard.

21 A.L.J. COSTELLO: Okay. I'm going to
22 sustain the objection, but let me just -- can you
23 just ask them why -- I mean, what is the benefit of
24 benchmarking and take it from there to see what --
25 how they respond about that.

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2 MR. PAGE: What is the benefit of
3 benchmarking

4 A.L.J. COSTELLO: I'm not, I mean, you
5 -- I'm just --

6 MR. PAGE: I'm agreeing with you.

7 A. (Hally) So I think the panel lays
8 out many of the benefits associated with benchmarking
9 in its direct testimony starting on line 14 and on
10 page 25 and going through line 13 on page 26.

11 BY MR. PAGE: (Cont'g.)

12 Q. Okay. On page 33, lines 21
13 through 23, and continuing on page 34, lines one
14 through four, you make the statement that -- that in
15 regard to your collection activities, you want to
16 provide time for the customers to acclimate to
17 collection activities. Is that correct?

18 A. Yes. I think you're referring to
19 lines 21 and 22 of the panel's direct testimony on
20 page 33.

21 Q. And, and you further go on -- on
22 page 34 to -- to indicate that the customer arrears
23 have - have -- have gone to significant levels and
24 that also you're talking in that same line about
25 writing off some of those arrears. Is that correct?

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2 A. So again, I think that what
3 you're referring to are lines one through four on
4 page 34 of the direct testimony of the customer
5 experience panel and I don't want to read it or
6 restate your question, but I'd say that we do talk
7 about the unprecedented number of customers in
8 arrears. It -- it does discuss DPAs that may
9 subsequently be established and that those DPAs may
10 have a significant impact on the timing of when
11 arrears may be written off. So it's -- it's
12 describing DPAs as a factor in the timing of
13 potential write offs that may or may not occur, yes.

14 Q. Should any company expect to have
15 customers pay bills?

16 A. So I think your question is if a
17 company provides a product or a service, should they
18 expect the customer to pay for that product or
19 service?

20 Q. Exactly.

21 A. I would say the answer to that is
22 yes.

23 Q. Do you believe that, that paying
24 bills is a behavior that may be unlearned -- not
25 paying bills is a behavior that may be unlearned?

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2 A. So I don't think that the panel
3 has opined on -- on the nature of its customers
4 learning or unlearning certain behaviors.

5 Q. Okay. is paying a bill a
6 customer service in that it demonstrates to a
7 customer a tangible value received?

8 MR. FITZGERALD: Your Honor, I object
9 to the question. It's very ambiguous and -- and
10 honestly a bit confusing for the panel, and I think
11 it's also been asked and answered in the panel, so
12 that they're not really talking about the ability of
13 the customers to learn or unlearn certain tasks
14 related to billing

15 A.L.J. COSTELLO: That's sustained.

16 MR. PAGE: Okay. I would like to ask
17 a question whether I can ask a question that's on
18 Exhibit 565 that has recently been submitted into
19 evidence.

20 A.L.J. COSTELLO: Sure. You want to
21 refer to 565?

22 MR. PAGE: Yes.

23 A.L.J. COSTELLO: Ask -- you can ask
24 your question, sure.

25 A.L.J. MORENO: And let me just

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2 confirm before you pose your question. Does the
3 panel still have that exhibit in front of them? I
4 believe that was provided by the Town of Olive. That
5 was the first Central Hudson bill in that packet of
6 information.

7 A.L.J. COSTELLO: T00-5?

8 A. (Hally) Yes, we have it. We're
9 just not as familiar with the exhibit numbers, so
10 thank you.

11 BY MR. PAGE: (Cont'g.)

12 Q. On page two of nine of that
13 exhibit, in the third column, under definition of
14 supply charges, do you see that the heading Clean
15 Energy Standard?

16 A. (Doane) Yes.

17 Q. Yes. Now, there are a number of
18 lines in that -- that definition. There's 1, 2, 3,
19 4, 5, 6, 7, there are eight lines in that definition.
20 Correct? And in those -- those eight lines, do you
21 agree that it would be impossible for a customer to
22 take that definition and understand what goes into
23 the Clean Energy Standard?

24 MR. FITZGERALD: Your Honor, I object
25 this calls for speculation about the state of mind of

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2 a particular customer or their understanding of this
3 particular section of language. And those customers
4 are not here today, nor have they been identified.

5 A.L.J. COSTELLO: Sustained.

6 MR. PAGE: Could I recast that then,
7 Your Honor?

8 A.L.J. COSTELLO: Sure. Right.

9 BY MR. PAGE: (Cont'g.)

10 Q. This is part of a customer bill.
11 What -- what should a customer understand then in
12 that definition?

13 A. (Hally) So, Mr. Page, when you
14 say, what should the -- excuse me, when you say, what
15 should the customer understand from that definition,
16 besides the definition itself or the section where it
17 says, these are the charges to recover, costs
18 associated with supporting renewable and zero
19 emissions power sources, what -- what specifically
20 are you looking for within that definition?

21 Q. Well, within that definition, I
22 was exclusively looking at the CES. And -- but in
23 that regard, it speaks to all those other in issues
24 under the general caption. And the question is, in
25 regard to Central Hudson billing, and, you know, some

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2 of the discussion that we've had in this testimony
3 today, would you agree that explaining and educating
4 customers is not a simple task?

5 A. I think there is a lot of
6 information that goes to customers and a significant
7 effort behind providing that information to customer
8 -- customers to try and provide them with the
9 information they need to understand these components.

10 MR. PAGE: Thank you. And that --
11 that ends my cross-examination, Your Honors.

12 A.L.J. COSTELLO: Okay. Thank you.
13 Okay. Before we turn for Communities for Local
14 Power, the time now is 3:36, and we'll take a 10-
15 minute break and we'll come back at 3:46. Off the
16 record.

17 (Off the record 3:36 p.m.)

18 (Off the record 3:46 p.m.)

19 A.L.J. COSTELLO: You're still under
20 oath. And we'll turn now to Communities for Local
21 Power.

22 CROSS EXAMINATION

23 BY MS. DACRUZ:

24 Q. Thank you so much, Your Honor.
25 Hello Panel. My name is Rosemary. I have a few

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2 questions for you. First, I would like to invite you
3 to turn to page 22 of your initial testimony. On
4 page 22, lines one through 22, the panel details
5 their plans to hire additional customer outreach
6 staff. Line 16 states that the current headcount of
7 the department is seven. Out of the current seven
8 customer outreach employees, how many -- excuse me.
9 I think it's consumer outreach, consumer outreach
10 representatives or consumer outreach staff speak
11 Spanish?

12 A. (Kopp) We don't have any Spanish
13 speaking consumer outreach representatives.

14 Q. Thank you. In the panel's
15 testimony on the same page, line 16 through 19, the
16 panel details that Central Hudson will be hiring five
17 additional customer outreach employees. Does the
18 company have any strategic hiring or recruitment
19 plans to fill these roles with employees who speak
20 Spanish?

21 A. We would agree that having a
22 bilingual rep is certainly a good trade to have, as
23 long as that the applicant has the other necessary
24 qualifications, then bilingual would definitely be a
25 plus.

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2 Q. Okay, thank you. Does Central
3 Hudson have plans to hire consumer outreach
4 representatives or customer service staff that speak
5 languages other than English or Spanish?

6 A. (Campagiorni) No.

7 Q. Thank you. What is the process
8 by which a Spanish speaking customer can report
9 language errors found on the Central Hudson Spanish
10 website or Spanish chat bot?

11 A. I think the channels today would
12 be to call us or email us.

13 Q. Okay. Thank you. And does
14 Central Hudson contract with an outside company or
15 firm for the translation of Spanish written and
16 digital materials, or is it handled by internal
17 staff?

18 A. (Doane) So Central Hudson has a
19 mix. We do have translation like digital channels
20 including chat that would use technology but we also
21 have a dedicated team of bilingual customer service
22 representatives who are tasked and do actively work
23 on the translation of some of our documents, letters
24 and forms.

25 Q. Thank you. Onto another topic.

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2 On the same page, page 22 lines five through eight,
3 the panel describes that the company has been
4 responding to the increase in public service
5 commission complaints by supplementing customer
6 outreach with employees from other departments.
7 Approximately how many employees are supplementing
8 customer outreach?

9 A. (Campagiorni) I'm sorry, would
10 you repeat the question?

11 Q. Absolutely. The panel describes
12 the company has been responding to the increase in
13 PSC complaints by supplementing customer outreach
14 with employees from other departments. Approximately
15 how many employees are supplementing customer
16 outreach?

17 A. None at this time.

18 Q. Thank you. Similarly, has the
19 company had to supplement other departments such as
20 the customer service call center with employees from
21 other departments in order to handle an elevated
22 number of calls?

23 A. There are times such as storms
24 where there might be all hands-on deck where we might
25 have people with certain skills that will help assist

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2 in taking calls or escalated calls for the contact
3 center.

4 Q. Do you have an example of which
5 departments these supplemented employees may
6 primarily be from?

7 A. There is no one, I think
8 department that is maybe predominant it -- it's
9 spread across various departments in the
10 organization.

11 Q. Thank you. Now turning to the
12 panel's rebuttal testimony, I would invite you to
13 turn to page 18. Good to go? Great. So lines one
14 through three, the panel states that the residential
15 customer survey target should be reduced by 13
16 percent to reflect lower ratings from customers in
17 arrears. Why does the panel believe it is pertinent
18 to exclude survey feedback from those in arrears in
19 its residential customer satisfaction survey?

20 A. We are not looking to exclude
21 them. We've taken a conservative estimate that half
22 of those customers, we say that about 26 percent of
23 those customers would be in arrears, about half of
24 them we don't think would have giving us four or five
25 being in a unfortunate situation in the arrear so

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2 we're not trying to exclude all of them, but we are
3 taking a percentage of them and looking for a
4 reduction there.

5 Q. Thank you for the clarification.
6 One last topic and then I'll be turning over to my
7 colleague. Please turn back to your initial
8 testimony on page 19, line one through seven, the
9 panel details, the company's plans for continuing
10 energy affordability program go growth. Does the
11 company have any additional plans for streamlining
12 enrollment, for example, by auto enrolling former EAP
13 recipients in subsequent years?

14 A. (Kopp) Yeah. At this time, we do
15 not have plans to auto enroll customers into EAP. We
16 would need verification that they're still enrolled -
17 - participating in the program so that it's a one-
18 year program.

19 Q. Thank you. And my final question
20 on the same page, line five through seven, the panel
21 states that Central Hudson will continue its outreach
22 and education efforts to notify eligible customers of
23 the EIP and how to qualify for benefits. While I
24 know you have detailed some of what you do insofar as
25 customer outreach in the testimony, what have these

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2 outreach and education efforts consisted of
3 specifically for the energy affordability program?

4 A. I am sorry, could you repeat the
5 question?

6 Q. Absolutely. what have the
7 outreach and education efforts for the EAP and how to
8 qualify for benefits consisted of specifically?

9 A. We have -- we've conducted over
10 80 in the last year. We've conducted over 80 events
11 outreach events, specifically a lot of them targeted
12 towards low-income communities. For example, food
13 pantry visits. We visit food pantries, different
14 food pantries around our service territory. We hand
15 out flyers regarding the discount program with ways
16 that customers can enroll right there with us. We
17 return to the food pantry usually a week or two
18 weeks. We'll let the customers know when we're going
19 to return to bring in their documentation if they
20 receive Medicaid or snap something like that, that
21 they can bring their documentation right to the food
22 pantry and we can enroll them right there. So that's
23 just one example of the -- the efforts that we've
24 undertaken in the last year.

25 MS. DACRUZ: Okay. Thank you very

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2 much. That concludes my questions. I will now pass
3 to my colleague.

4 CROSS EXAMINATION

5 BY MS. MULLEN:

6 Q. Hi, I'm Jess Mullen. I have a
7 follow-up question to that. How many households were
8 enrolled in EAP in 2022 and then 2023?

9 A. (Campagiorni) We just don't have
10 that information right in front of us here.

11 Q. Okay, I can move on. CLP has
12 cross examination questions regarding the panel's
13 responses to CLPs set six IRs 32, 33, 34, 35, 36, 37,
14 38, and 39 and CLP set eight, IRs 54, 55, 56, 57, 58,
15 59, and 60 and CLP set 13 IRs 80 and 81 will
16 distribute these and other pertinent documents for my
17 cross. Now everyone should have a batch that has
18 three paperclip packets and if the panel could review
19 them, that would be great.

20 A.L.J. COSTELLO: While you were
21 reviewing it, I just want to go off the record just
22 to.

23 (Off the record 4:00 p.m.)

24 (On the record 4:03 p.m.)

25 A.L.J. COSTELLO: And I'm just going

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2 to identify the documents with exhibit numbers for
3 identification. So starting with CLP06 IR 32 will be
4 572, IR 33 will be 573, IR 34 will be 574 IR 35 will
5 be 575, IR 36 will be 576, IR 37 will be 577, IR 38
6 will be 578 and IR 39 will be 579. Turning to CLP-08
7 IR 54 will be 580, IR 55 will be 581, IR 56 will be
8 582, IR 57 will be 583, IR 58 will be 584, IR 59 will
9 be 585, and IR 60 will be 586. Turning to CLP-13 IR
10 80 will be 587, IR 81 will be 588. And then the
11 exhibits that follow are exhibits that are already in
12 the record. Okay, Ms. Mullen.

13 BY MS. MULLEN: (Cont'g.)

14 Q. Thank you. Did the panel prepare
15 the responses to these IRs?

16 A. (Doane) Yes.

17 MS. MULLEN: I ask that these IRs be
18 moved into evidence.

19 MR. FITZGERALD: Your Honor, the
20 company objects to having gone through this to a
21 series of these IRs, which we objected to at the
22 time that we responded to them as to those that were
23 vague or overly broad, they have no relevance in this
24 particular proceeding as the response is there. And
25 others we objected to as the point that particularly

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2 for what has been tenderly marked as Exhibit 576 that
3 it was irrelevant and not tailored to the proceedings
4 or commensurate with the importance of the issues to
5 which the proceedings relate. And we do stand on
6 that objection.

7 A.L.J. COSTELLO: Okay. So can you
8 identify the specific?

9 MR. FITZGERALD: Yes, Your Honor.
10 Sorry. 576, which is IR 036 587.

11 A.L.J. COSTELLO: All right, let me --
12 I'm just -- let's -- let's just take them one at a
13 time.

14 MR. FITZGERALD: Sure.

15 A.L.J. COSTELLO: 576 and you have an
16 objection to the response. And again, the prior --
17 prior at least one time, you indicated that you were
18 not objecting to entry of the document, but you were
19 allowing entry of the document subject to the
20 objection. Is this -- this the case or is this?

21 MR. FITZGERALD: Your Honor, in that
22 earlier example, we had objected and then provided a
23 response, if my recollection is correct. Here, we
24 believe this entire interrogatory was irrelevant and
25 not tailored to the proceedings and so it has no

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2 value because what it stands for only is that we made
3 an objection. Whereas in the other ones, we had made
4 an objection, but we did provide an additional
5 response.

6 A.L.J. COSTELLO: Okay. Ms. Mullen,
7 do you have a response to that?

8 MS. MULLEN: I guess I would've a
9 question, wouldn't they be able to redact the
10 personal information and still provide that?

11 A.L.J. COSTELLO: It's not -- the --
12 the objection is that the -- the company's response
13 was simply objecting on different grounds. There was
14 no, then no discovery dispute, which would've brought
15 this to our attention, could have been resolved ahead
16 of time if there was, you know, anything to be
17 resolved. So since there is no information provided
18 by the company other than an objection, they're
19 saying there's really no value to entering into this
20 as an exhibit. And I -- I tend to agree and unless
21 you can, you know, provide a reason, otherwise, we're
22 going to just keep this marked for identification and
23 -- and not submit this into evidence.

24 MS. MULLEN: I think that that's okay.

25 A.L.J. COSTELLO: Okay.

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2 MS. MULLEN: And that's 36, right?

3 A.L.J. COSTELLO: That's 576. It's IR
4 36 and then I believe you had some other objections.

5 MR. FITZGERALD: Yes, Your Honor.
6 It's similar to that, I think --

7 A.L.J. MORENO: And I'm sorry, could
8 you just move that microphone?

9 MR. FITZGERALD: Yeah. Thank you. I
10 did slide it away a little bit. Yes. Turning to
11 what was marked as Exhibit 587, again this response
12 reflects an objection to the -- by the company to the
13 question and the materials or the -- the nature of
14 the materials and what was sought. So what this IR
15 response reflects is simply the company's objection.
16 And similar to the discussion on the prior
17 interrogatory, we therefore feel it's not appropriate
18 for the evidentiary record.

19 A.L.J. COSTELLO: Okay. And we're
20 going to make the same ruling. This document will
21 just remain identified as Exhibit 587 for
22 identification only and not be admitted into the
23 evidentiary record. So that's number 587, which is
24 IR 80. And is there any other document?

25 MR. FITZGERALD: Yes, Your Honor. And

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2 the following one, which was IR 081, I believe the
3 company made a similar objection and -- and my
4 discussion about the prior IR 587 is the same.
5 Again, this reflects nothing more than the company's
6 objection and therefore has no evidentiary value and
7 should not be included in the evidentiary record.

8 A.L.J. COSTELLO: Okay. And it will
9 be the same ruling with respect to the document
10 that's been marked for identification as Exhibit 588.
11 With respect to the other documents, you have no
12 objections?

13 MR. FITZGERALD: We have no objections
14 to the other documents, Your Honor, as to admission
15 into the evidentiary record.

16 A.L.J. COSTELLO: Okay. So the
17 exhibits that have been marked for identification as
18 Exhibits 572 through 586, with the exceptions of 588,
19 576, and 587 will be admitted into the record.

20 (Composite exhibits 572 through 575,
21 577 through 586 admitted into evidence.)

22 A.L.J. COSTELLO: Okay. Ms. Mullen.

23 MS. MULLEN: I just have a question.

24 A.L.J. COSTELLO: Certainly.

25 MS. MULLEN: A procedural question.

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2 If these are in exhibit, but they are still -- can I
3 refer to them when I ask a question?

4 A.L.J. COSTELLO: There's -- there's
5 really -- you can't read from them or, you know, you
6 can -- you might be able to ask questions, but again,
7 these objections might be, you know, raised with
8 respect to those questions as well. But you -- you
9 can ask similar questions at this time.

10 BY MS. MULLEN: (Cont'g.)

11 Q. Okay. The first question is, are
12 promotional emails from the company sent out by staff
13 members on the customer experience panel?

14 A. (Campagiorni) Emails are not sent
15 out by the particular members of this panel.

16 Q. What are the staff titles of the
17 people who are tasked with sending out emails?

18 MR. FITZGERALD: Your Honor, I just
19 objection as to the form. It's not clear which
20 individual would be referenced or which emails?

21 MS. MULLEN: Promotional emails, Your
22 Honor.

23 A.L.J. COSTELLO: Did they indicate
24 who -- who sends out? You're trying to find out who
25 sends out those emails. Okay. You can answer that.

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2 A. (Campagiorni) Can -- can you just
3 clarify when you say promotional emails, are you
4 referring to anything specifically?

5 MS. MULLEN: Yeah, I actually have
6 some stuff in here. If you want to turn the same
7 sort of after IAD in IAD 1 and Exhibit 1, it's
8 Exhibit four. That's an example of an email, a
9 promotional email.

10 MR. FITZGERALD: Your Honor, again,
11 this is reference to the materials that we have
12 already objected to previously and this our objection
13 stands.

14 MS. MULLEN: Your Honors --

15 A.L.J. COSTELLO: I believe this is to
16 exhibit four, which is a document that's already
17 Exhibit 4 that's already been --

18 MR. FITZGERALD: I apologize, Your
19 Honor. Yes, I -- I had those two together in my
20 file. Thank you.

21 MS. MULLEN: Additionally in their
22 rebuttal on page 39 at line 19 --

23 A.L.J. COSTELLO: Let -- why don't you
24 have a question with respect to Exhibit 4, let them -
25 - let them look at Exhibit 4. Have you --

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2 BY MS. MULLEN: (Cont'g.)

3 Q. Have you reviewed the exhibit?

4 A. (Hally) Yes.

5 Q. What's the title of the staff
6 member or members who draft this email and then
7 what's the title of the staff member who edits it and
8 what department are they in?

9 A.L.J. MORENO: Okay, let's just take
10 those one at a time.

11 BY MS. MULLEN: (Cont'g.)

12 A. (Hally) So I believe this was
13 asked yesterday and answered that it is our corporate
14 communications department.

15 Q. Thank you. It was not answered,
16 actually.

17 A.L.J. COSTELLO: It may not have been
18 with respect to the specific exhibit, but I do
19 believe they indicated who sent out promotional
20 emails.

21 MS. MULLEN: Is the corporate
22 communications department on the Customer Service
23 Panel that answered IRs in reference and stuff like
24 that to communications. Also in the rebuttal
25 testimony, communications is mentioned, but I will

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 get into that if I need to.

3 A.L.J. COSTELLO: So are you asking --
4 just ask your question again --

5 MS. MULLEN: Sure.

6 A.L.J. COSTELLO: -- about the
7 Customer Experience Panel.

8 MS. MULLEN: Is there somebody here
9 today on the Customer Service Panel from the
10 corporate communications department --

11 A.L.J. COSTELLO: It's the Customer
12 Experience Panel, yeah, go ahead.

13 BY MS. MULLEN: (Cont'g.)

14 Q. Yeah, from the -- from -- who's
15 on the Customer Experience Panel, is there somebody
16 here who's from the communications department?

17 A. (Hally) I apologize, Ms. Mullen.
18 We do not have a member of the panel here today that
19 comes from the customer -- the corporate
20 communications department.

21 Q. Thank you. In your rebuttal,
22 page 39 at line 19 through line two you mentioned
23 Central Hudson has created a robust customer
24 education and information campaign to communicate the
25 implementation of monthly meter reading as shown in

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 Exhibit CEP-11R. This includes direct customer
3 communications, including emails and print
4 newsletters and so on. I have excerpt. Are you
5 familiar with this testimony?

6 A. Yes, we are.

7 Q. This is the panel's testimony?

8 MR. FITZGERALD: Your Honor, that's
9 asked and answered.

10 MS. MULLEN: I withdraw it.

11 BY MS. MULLEN: (Cont'g.)

12 Q. Can you tell us about the direct
13 customer communications that's involved here?

14 A. (Hally) So I believe those direct
15 customer communications are listed in Exhibit CEP 11R.

16 Q. Thank you. I'm just going to
17 scroll through because I have to go through the IRs
18 that were accepted into evidence or exhibit. Let's
19 see. Please turn in the packet to Exhibit 1 in the
20 packet the IR80 IR81, and then there's Exhibit 1.
21 Please turn to the appendix. I believe it's BB and
22 CC. If you could just sort of review those now,
23 appendix BB, front and back sheet one and two, and
24 Appendix CC. There's a couple pages there. I'll
25 wait a minute while you review it.

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2 A.L.J. MORENO: And Ms. Mullen, is
3 this -- I believe you referenced these documents
4 yesterday. These were attachments to a joint
5 proposal that were filed in the last rep case, is
6 that correct?

7 MS. MULLEN: Yes. And it's part of my
8 testimony.

9 A.L.J. MORENO: It's JM01.

10 MS. MULLEN: Yeah, JM01.

11 A.L.J. MORENO: Okay, thank you.

12 BY MS. MULLEN: (Cont'g.)

13 Q. Thank you. Are you familiar with
14 this document?

15 A. (Hally) Yes.

16 Q. Is there a staff person within
17 the Customer Experience Panel that focuses on Central
18 Hudson's role in New York reaching its approaching
19 climate objectives? I can read it again. Is there a
20 staff person within your panel that focuses on
21 Central Hudson's role in New York as New York aims to
22 reach its climate goals?

23 MR. FITZGERALD: Your Honor, I just
24 have to ask a question about the -- the framing of
25 it. Is it just -- is it simply a question of is

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 there a panel member that works in that area? It's
3 the reference to staffing or staff person or staff
4 member of the panel that -- that's confusing.

5 A.L.J. MORENO: So Ms. Mullen is the
6 question whether there's a panelist who works in that
7 area?

8 MS. MULLEN: Yes, or if they know of
9 one.

10 A.L.J. COSTELLO: Well, is there a
11 panelist, ask one question at a time.

12 BY MS. MULLEN: (Cont'g.)

13 Q. Yes. Is -- do any of you focus
14 on Central Hudson's role in fostering New York's
15 achievement of its climate goals?

16 A. (Hally) So I think this question
17 was asked of our climate leadership and
18 sustainability panel yesterday, and the response was
19 that those responsibilities are spread throughout the
20 company depending on the initiative that goes towards
21 that very broad goal or set of goals that are
22 established within the CLPCPA. There are many
23 activities and initiatives that the company
24 undertakes that facilitate the progress of those
25 goals and targets.

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2 Q. Today is actually a new question.
3 It's specifically within the Customer Experience
4 Panel. Is there somebody who focuses on New York's
5 climate goals?

6 MR. FITZGERALD: Your Honor, I just
7 object here because again, focus is the -- is the
8 problem. I mean, it's vague in this context. Each
9 of the panel members have different responsibilities
10 and the panel has already indicated that depending on
11 the nature of the initiative different skill sets
12 within the company are pulled together, which may
13 involve other individuals or multiple individuals
14 beyond this panel. So I think if they want to
15 reframe the question and ask the panel members
16 something more direct, they'll be able to respond.

17 BY MS. MULLEN: (Cont'g.)

18 Q. Does Central Hudson have a policy
19 as it relates to customer facing endeavors needed for
20 New York to reach its climate goals?

21 A. (Campagiorni) Can you rephrase
22 the -- or just repeat the question just so we
23 understand it?

24 Q. Sure. I'll repeat it and then I
25 can rephrase it, but I prefer not to. Does the

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 company have a policy as it relates to customer
3 facing endeavors that are needed for New York to
4 reach its climate goals?

5 A. (Hally) So that's beyond the
6 scope of this panel's testimony.

7 Q. Is the corporate --, I think I
8 asked this already. I just want to confirm. Is the
9 corporate communications department considered to be
10 under the customer experience panel?

11 MR. FITZGERALD: Your Honor, as a
12 panel here for the rate case, it has no one under it
13 as a panel. So I will object to the framing of the
14 question and it's creating confusion.

15 A.L.J. COSTELLO: It's sustained. Can
16 you try to rephrase your question?

17 MS. MULLEN: Do you know if there's a
18 corporate communications representative or someone
19 from -- somebody from that department on any of the
20 panels that will be here for the evidentiary hearing
21 and I ask because in various areas of your testimony
22 and rebuttal, communications plans are mentioned, as
23 I read before.

24 A.L.J. COSTELLO: Are communications
25 plans are in their testimony? Does that refer to

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 plans dealing with the CLCPA, and if so, please refer
3 to that.

4 MS. MULLEN: One moment please.

5 A.L.J. COSTELLO: Certainly.

6 MS. MULLEN: Your Honor, in the things
7 that I've noted it's not about climate goals, it's
8 more about establishing performance improvement
9 goals, as mentioned on lines 10 through 12 on page 25
10 of the Customer Experience Panel testimony.

11 A.L.J. COSTELLO: Okay. But now
12 you're asking them specifically about the CLCPA,
13 which they did not refer to in their testimony. So
14 you really have to tie it back into what they
15 testified to and this is not an opportunity also like
16 for discovery. So, you know, you have to -- you're
17 cross examining them on the testimony that they
18 provided.

19 MS. MULLEN: Thank you, Your Honor.
20 We can move on from that question. And this is for
21 the Customer Experience Panel, and I apologize if
22 it's not the correct panel, but the IRs that I had
23 received were answered by the Customer Service Panel
24 about emails and promotional materials.

25 A.L.J. COSTELLO: Then refer to the

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2 IRs and ask questions with respect to that.

3 MS. MULLEN: I didn't know that I
4 could be referring to the ones that weren't put into
5 exhibit.

6 A.L.J. COSTELLO: No, if they weren't
7 put into evidence, you cannot. I mean, you can ask
8 questions about the subject matter. Again, it may
9 not be appropriately directed to this panel, but you
10 can ask the questions. You just can't refer to the -
11 - the documents that aren't in evidence.

12 MS. MULLEN: I guess I'm just confused
13 because the Customer Experience Panel is the one who
14 answered. And so --

15 A.L.J. COSTELLO: The three documents
16 that weren't admitted -- submitted into evidence.
17 They -- they were simply objections, legal objections
18 made in those documents. They were not answers --
19 substantive answers.

20 MS. MULLEN: What's confusing to me,
21 and I apologize is that it was sent to the capital --
22 gas capital and operations panel, but the customer
23 experience panel answered, and that's what's
24 confusing to me. So I apologize and I'll move on.

25 BY MS. MULLEN: (Cont'g.)

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2 Q. What staff positions or
3 departments create the language for the company's
4 website, which involves the customer experience?

5 A. (Campagiorni) Our website is
6 managed by our corporate communications department.

7 Q. I don't know if this is going to
8 get objected to, but, you know, if the Corporate
9 Communications Panel or department, are they on your
10 panel?

11 A. (Hally) I think we answered that
12 question earlier that we do not have a member of the
13 corporate communications department on this panel.

14 Q. Do you know if they're on a
15 different panel?

16 A. I'm sorry, Ms. Mullen, we -- we
17 do not have a member of the corporate communications
18 team on any of our panels.

19 Q. Thank you. Okay. Let's turn to
20 a different packet that starts with IR 54. Please go
21 to and review IR 55, actually, it's page two.

22 A.L.J. COSTELLO: And just for clarity
23 of the record, that's Exhibit 581.

24 BY MS. MULLEN: (Cont'g.)

25 Q. Looking at IR 54, which is

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 focused on the number of employees in customer
3 service, do the numbers in this table include people
4 who've been contracted out or who work for companies
5 that have been contracted out for a customer service
6 role?

7 A. (Hally) Could I just ask for a
8 clarification? Are you addressing IR 55 or 54? I
9 think just the way you had started your question.

10 Q. Thank you so much. 55, I
11 apologize. I can read it again too. Do the numbers
12 in this table include people who've been contracted
13 out or who work for companies that have been
14 contracted out for a customer service role?

15 A. (Campagiorni) No.

16 Q. Do you have a number of -- do you
17 have a number for them, a number of people who've
18 been contracted out or who work for companies that
19 have been contracted out for a customer service role?

20 A. Ms. Mullen, I don't know if
21 you're looking for a -- a specific period of time,
22 but we don't have that data right in front of us here
23 right now.

24 Q. Where is the -- the data kept for
25 tracking the numbers of people who are in a customer

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 service role but aren't actually staff of Central
3 Hudson?

4 A. (Hally) Could you maybe point us
5 to our -- the area of our testimony where we're
6 talking about where your questions are based out of?
7 I'm just, I think we just need a frame of reference
8 or understanding,

9 Q. I guess because you answered it
10 in the IR 55, that was why I was asking, that the
11 question that you answered there relates to it.

12 A.L.J. COSTELLO: They indicated that
13 it -- it does not include anyone that, you know, any
14 contractors. So do you want to ask another question
15 about whether there are any contractors currently in
16 the -- that aren't employees that are not reflected
17 in this document?

18 MS. MULLEN: This questions the
19 response gives both union and management employees.

20 A.L.J. COSTELLO: Right, and
21 contractors are not union or management employees.

22 BY MS. MULLEN: (Cont'g.)

23 Q. Do you have people who work in
24 customer service roles who are not employees, either
25 union or management?

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2 A. (Campagiorni) Yes, we do utilize
3 contractors.

4 Q. And where is the information for
5 that kept unless you have it with you today?

6 MR. FITZGERALD: Your Honor, I'm going
7 to object to that again as more the nature of
8 discovery in the first part. Secondly, it's beyond
9 the scope of what this panel testified to or as
10 provided information on as to here, as to the
11 employees. So again, I think the panel has indicated
12 they don't have the information available and you
13 know, again, it's more in the nature of discovery.

14 MS. MULLEN: I can move on.

15 A.L.J. COSTELLO: That's sustained.
16 Okay.

17 BY MS. MULLEN: (Cont'g.)

18 Q. I can move on. Our contact
19 center staff or employees also classified as customer
20 service representatives CRS if they're a different
21 job classification, please explain the difference.
22 You can still refer to IR 55.

23 A. (Campagiorni) I apologize. Can
24 you just repeat the question just so we can answer it
25 accurately?

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2 Q. Sure. And you can like reference
3 IR 55, our contact center staff or employees
4 mentioned in this IR response, also classified as
5 customer service representatives. If they're a
6 different classification, please explain the
7 difference.

8 A. So the -- yeah. CSRs are
9 included in that number, but they are not the only
10 class of employees. There's also customer support
11 assistance in there. There's management roles in
12 there in terms of supervisors and directors as well
13 and there's clerical assistance as well in those
14 numbers.

15 Q. Thank you. Does the work of the
16 contact center staff overlap with the work of any
17 other departments? If yes, which departments?

18 A. Just repeat the question. I'm
19 sorry.

20 Q. Does the work of contact center
21 staff overlap with the work of any other departments?

22 A. Yes.

23 Q. Which departments?

24 A. The variety of calls that a
25 customer service representative would take, could

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2 encompass many areas of the company. It could go
3 from billing issues to outreach issues, to tree
4 trimming issues, to a regulatory issues to a
5 corporate contribution. I mean, it runs the gamut,
6 so I can't identify it. It really touches so many
7 different departments depending on the nature of the
8 inquiry. So it's very dependent.

9 Q. Is staff from those other
10 departments available to take calls from customers
11 calling in?

12 A. Not generally, but it's going to
13 depend on the circumstances. So we had mentioned
14 earlier here in this panel that like billing texts
15 don't take direct calls from customers. But
16 certainly outreach people would take calls. So it's
17 very dependent on the nature of the call and what
18 department -- there's -- there's not a yes or no
19 universal answer here.

20 Q. Thank you. Let's move on to, I
21 believe it's the final packet. It starts with IR 32,
22 and then on the third page, IR 34, Central Hudson
23 stated that as of October 19th, 2023, 50 cases filed
24 with the Department of Public Service remain open.
25 How many remain open as of today? What's that number

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2 for today?

3 A. So each month the company files a
4 report with the Director of Consumer Services here on
5 his PSC complaints. I don't have that number right
6 in front of me but we do file that each month with
7 the Director of Consumer Services at the Department
8 of Public Service.

9 Q. Thank you. My next question was
10 how many cases were closed in 2023?

11 A. I don't have that information
12 with me right now.

13 Q. Please review the next page,
14 which is IR 35.

15 A.L.J. COSTELLO: And just for the
16 record, that's Exhibit 575.

17 BY MS. MULLEN: (Cont'g.)

18 Q. Looking at IR 35 in which Central
19 Hudson states, the company will follow its policy to
20 adjust any customer bills that require correction and
21 provide any necessary reimbursement through a bill
22 credit or refund. Can you explain the policy that's
23 referenced here?

24 A. So I think our answer here
25 complies with the policy from our tariffs New York

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2 Code rules and regulations and any statutory
3 requirements we have as it pertains to this issue.

4 Q. And that's the policy to adjust
5 customer bills that require correction.

6 A. Yes.

7 Q. Thank you. Turning another page
8 or two to IR 37, please review.

9 A.L.J. COSTELLO: And that's exhibit
10 577.

11 BY MS. MULLEN: (Cont'g.)

12 Q. When asked about any and all
13 methodology and protocols for resolving customer
14 billing issues, central Hudson states each call can
15 be unique and each CSR has multiple approaches to
16 identify account specifics and help bring resolution
17 to the call. Can you please describe or explain the
18 multiple approaches in a comprehensive way so that as
19 many approaches as permitted by Central Hudson can be
20 learned about today?

21 A. (Hally) So, Ms. Mullen, I
22 apologize, I don't think the panel is capable of
23 doing that today in the detail that you're asking
24 for.

25 Q. Is that information available in

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2 a certain place, like do you have that, those
3 approaches, is it part of a policy methodology,
4 protocols?

5 MR. FITZGERALD: Your Honor, I object
6 again as to this is not the time for discovery and
7 the panel's already indicated and asked that they
8 don't have the specific details here as to any and
9 all possible and variable flows that a customer call
10 could take through the process.

11 A.L.J. COSTELLO: Sustained.

12 MS. MULLEN: Just a question that was
13 an objection for my second question, my follow up
14 about where the information is stored, right?

15 A.L.J. COSTELLO: And also about what
16 the multiple approaches are that the CSR -- each CSR
17 takes.

18 BY MS. MULLEN: (Cont'g.)

19 Q. Is there a handbook or document
20 or guide available for customer service
21 representatives to use in the event a customer calls
22 with a billing error?

23 A. (Campagiorni) So we do provide --
24 provide substantial and significant training
25 including training documentation to our CSRs that

1 1/31/24 - Central Hudson G&E - 23-E-0418/23-G-0419
2 they can continue to reference.

3 MS. MULLEN: Thank you. This
4 concludes my cross examination. Thank you,
5 panelists, and thank you, Your Honors.

6 A.L.J. COSTELLO: Thank you. Central
7 Hudson, I take it you'll need a few minutes.

8 MR. FITZGERALD: Thank you, Your
9 Honor. Yes, we will. It's been a long day, but let
10 us --

11 A.L.J. COSTELLO: Okay. Off the
12 record.

13 (Off the record, 4:45 p.m.)

14 (On the record, 4:51 p.m.)

15 A.L.J. COSTELLO: Central Hudson, any
16 redirect?

17 MR. FITZGERALD: Yes, Your Honor.
18 Just two quick questions.

19 A.L.J. COSTELLO: Okay. Proceed.

20 REDIRECT EXAMINATION

21 BY MR. FITZGERALD:

22 Q. Panel, do you recall a discussion
23 you had with PULP regarding the IVR modernization
24 project?

25 A. (Doane) Yes.

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2 Q. Would the panel like to clarify
3 its statement regarding its willingness to pursue
4 other options with -- with respect to that project?

5 A. Yes. To clarify, Central Hudson
6 is open and willing to assess the vendor that would
7 be associated with the modernization of the IBR
8 system.

9 MR. FITZGERALD: Thank you. We have
10 no further questions, Your Honor.

11 A.L.J. COSTELLO: Does PULP have any
12 recross?

13 MS. WHEELLOCK: No, Your Honors, thank
14 you.

15 A.L.J. COSTELLO: Okay. Alright.
16 With that, we thank the panel for your testimony and
17 you are excused. Okay. We're going to go off the
18 record.

19 (The hearing adjourned at 4:52 p.m.)
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2 STATE OF NEW YORK

3 I, MONIQUE HINES, do hereby certify that the foregoing was
4 reported by me, in the cause, at the time and place, as
5 stated in the caption hereto, at Page 2970 hereof; that
6 the foregoing typewritten transcription consisting of
7 pages 2970 through 3262, is a true record of all
8 proceedings had at the hearing.

9 IN WITNESS WHEREOF, I have hereunto
10 subscribed my name, this the 2nd day of February, 2024.

11 *Monique Hines*
12 MONIQUE HINES, Reporter

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