

BEFORE THE  
STATE OF NEW YORK  
PUBLIC SERVICE  
COMMISSION

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In The Matter of  
Rates, Charges, Rules, and Regulations of  
Liberty Utilities (St Lawrence Gas) Corp for Gas Service.

Cases 24-G-0668

April 01, 2025

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Prepared Exhibit of:

Pooja Oberoi  
Program Associate

Utility Intervention Unit,  
Division of Consumer  
Protection NYS Department of  
State

123 William Street

New York, NY 10038

[www.dos.ny.gov](http://www.dos.ny.gov)

INDEX TO EXHIBIT LIST  
of  
DIRECT TESTIMONY OF POOJA OBEROI

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**STAFF OF THE DEPARTMENT OF PUBLIC SERVICE  
INTERROGATORY/DOCUMENT REQUEST**

**Liberty Utilities (St. Lawrence Gas) Corp.  
24-G-0668  
Gas Rates**

<b>Request No.:</b>	DPS-317
<b>Requested By:</b>	Anthony Mannarino
<b>Information Requested of:</b>	Kim Baxter
<b>Date of Request:</b>	December 19, 2024
<b>Response Due Date:</b>	December 30, 2024
<b>Date of Response:</b>	January 17, 2025
<b>Name &amp; Position of Respondent:</b>	Christine Downing Director, Customer Experience - East Region
<b>Subject:</b>	AMP

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**LIBERTY UTILITIES (ST. LAWRENCE GAS) CORP.'S GENERAL DEFINITIONS**

1. "DPS" shall mean the New York State Department of Public Service.
2. "General Objections" shall mean the general objections Liberty SLG provided in response to DPS-250.
3. "Liberty SLG" or the "Company" shall mean Liberty Utilities (St. Lawrence Gas) Corp.
4. "LUCo" shall mean Liberty Utilities Co.
5. "LUSC" shall mean Liberty Utilities Service Corp.
6. "Protective Order" shall mean Administrative Law Judges Leah Soule Amyot and Ashley Moreno's December 13, 2024 Ruling Adopting Protective Order in this case.
7. "PSC" shall mean the New York Public Service Commission.
8. "PSL" shall mean the New York State Public Service Law.
9. "Staff" shall mean DPS Staff.

**DPS-317**

1. In reference to page 15 of the direct testimony of Christine J. Downing in the Customer Care Panel, provide a detailed breakdown of the following costs, and an explanation of how the Company arrived at each cost:

- a. \$72,912 estimated cost for the Arrearage Management Program,
- b. \$1,000 for customer communications; and c. \$25,000 for IT cost.

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**Liberty Utilities (St. Lawrence Gas) Corp.  
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**DPS-317 continued.**

**Liberty SLG’s Response to DPS-317.**

Liberty SLG hereby incorporates the General Objections. Subject to and without waiving any of the General Objections, Liberty SLG provides the following response:

- a. The \$72,912 estimated cost of the Arrearage Management Program (AMP) was derived by taking the average amount of arrears for the 232 eligible customers (which equals \$314.28) and multiplying that by the number of eligible customers. To determine the number of eligible customers, the Company extracted a list of the low-income customers in arrears \$300 or more who are currently past due 30 days or more. See “Attachment DPS-317.xlsx” containing data used to forecast customers currently eligible, and their balances.

<b><i>AMP Eligible Customers</i></b>	
Estimated Eligible Customers	232
Current Total Arrears	\$72,912
Average of Arrears	\$314.28
Potential Arrears Forgiveness	\$72,912
Estimated Program Cost	\$72,912

- b. The Company estimates a low dollar amount to be spent on communications because there are currently only 232 customers who qualify for the AMP as proposed. The Company’s targeted communications would primarily be through direct emails, text messages, and phone calls, but might also include a direct mail piece. If the Company were to have to mail all 232 customers three times, the cost would be \$870 for materials and postage (232 customers x \$1.25 each x 3). The number of customers who qualify will vary, thus the Company rounded \$870 up to \$1,000.

<b><i>Communications Costs for AMP</i></b>	
Proposed Budget: \$1,000	
Potential AMP Customers	232
Average mailings per customer	3
Total Mailings x \$1.25 Postage	\$ 870.00

- c. The IT cost estimate of \$25,000 is dependent on the Company’s assumed ability to leverage the current programming within SAP from another one of its companies. This would leave

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**DPS-317 continued.**

the bulk of the cost to be spent on testing. The Company anticipates that approximately \$8,300 would be spent on programming and configuration, while approximately \$16,700 would be spent on quality assurance and testing of the program. The Company arrived at these amounts due to its experience with testing this program for other companies currently offering it and the limited amount of core programming necessary.

<b><i>IT Costs for AMP</i></b>	
Proposed Budget: \$25,000	
Programming/Configuration (83 hrs)	\$ 8,300.00
Testing/Quality Assurance (167 hrs)	\$ 16,700.00

Name and Title of Person(s) Responsible for Response: Christine Downing Director, Customer Experience - East Region

Date: January 17, 2025

Liberty Utilities (St. Lawrence Gas) Corp.  
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DPS-317

Count of Customers	Total
232	72912.36

Average Arrears	314.28
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To estimate/calculate our AMP budget, we took average balance of the current low income customers 30 days in arrears (eligible customers), with a balance of \$300 or greater and multiplied that by the total # of eligible customers.

$$232 \times \$314.28 = \$72,912.36$$

$$\text{Total Arrears} = \$72,912.36$$

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**Liberty Utilities (St. Lawrence Gas) Corp.  
24-G-0668  
Gas Rates**

**Request No.:** DPS-369  
**Requested By:** Anthony Mannarino  
**Information Requested of:** Kim Baxter  
**Date of Request:** January 02, 2025  
**Response Due Date:** January 13, 2025  
**Date of Response:** January 17, 2025  
**Name & Position of Respondent:** Christine Downing Director, Customer Experience -  
East Region  
**Subject:** Customer Service Performance Indicator

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**LIBERTY UTILITIES (ST. LAWRENCE GAS) CORP.'S GENERAL DEFINITIONS**

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**DPS-369**

1. Provide the Company's Customer Satisfaction Index score for 2022, 2023 and 2024.
2. State whether the Company incurred a Negative Revenue Adjustment (NRA) for missing any customer service performance indicator targets. If so, provide the targets missed and the NRA amount.
3. On page 7 in the direct testimony of Christine Downing, the Company stated that it introduced transactional surveys via Qualtrics. Provide the following:
  - a. When the Company started to use Qualtrics.
  - b. Differences between Qualtrics and the Luth survey, including cost and frequency.
  - c. Provide any improvements since Qualtrics was introduced.
  - d. A sample Qualtrics report.
4. On pages 3 to 5 in the direct testimony of Christine Downing, the Company proposed to re-introduce the Positive Revenue Adjustment for the Terminations and Uncollectible Expense. Provide the following:
  - a. A detailed explanation for re-introduce the Terminations and Uncollectible Expense and the targets.
  - b. Five years of terminations and uncollectibles expenses for the Company.

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**Liberty Utilities (St. Lawrence Gas) Corp.  
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Gas Rates**

**DPS-369 continued.**

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**Liberty SLG's Response to DPS-369.**

Liberty SLG hereby incorporates the General Objections. Subject to and without waiving any of the General Objections, Liberty SLG provides the following response:

1. The Company's customer satisfaction index scores for 2022, 2023, 2024 were:
  - 2022 = 81%
  - 2023 = 82%
  - 2024 = 88%
2. The Company incurred NRAs on the CSAT portion of the CSPI in 2022 and 2023.
  - The overall target for CSAT is >86%
    - >86% = 0 Basis Points
    - 86% = 5 Basis Points
    - 85% = 10 Basis Points
    - 84% or less = 15 Basis Points
  - The NRA's incurred were as follows:
    - 2022 = \$36,000 (set dollar amount)
    - 2023 = 15 Basis Points = \$36,090 (moved to basis points)
    - 2024 = N/A
3. The Company provides the following in response to this request.
  - a. Qualtrics surveys were implemented at Liberty SLG in January 2024.
  - b. Qualtrics is a transactional based survey managed internally and is performed after a customer contacts the Company. When a customer calls into the call center the survey is triggered and sent out at the completion of the call via email. The call center supervisor and management staff have real-time access to surveys and overall results. This has allowed the Company to institute a closed-loop process allowing the supervisor to proactively monitor the survey results. When a customer express concerns or dissatisfaction, the supervisor contacts that customer immediately to address those concerns and resolve any outstanding issues in real time. This enhances the customer experience and over time increases overall customer satisfaction.

The Luth survey is an independent survey managed by a third-party vendor, Luth Research. The Luth survey is an overall customer satisfaction survey that is performed by email and phone on an annual basis, typically completed in the September timeframe. This survey is

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**DPS-369 continued.**

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sent out to all customers the Company has an email address on file. If the Company does not receive enough respondents, Luth Research will call customers to increase participation. These survey responses are anonymous, therefore concerns and/or issues are not addressed to specific customers except on rare occasions when a customer states that they want the Company to contact them.

The Qualtrics survey is short, and the questions are based around the customer's experience within the call, including first call resolution, the reasons for their call, along with how they feel overall about the Company. The Luth survey is longer and has more questions covering a broader array of subjects such as overall customer experience, billing, payment options, operational experiences, and knowledge of energy efficiency programs.

The cost difference between the survey methods is minimal with Qualtrics costing approximately \$15,341 in 2024 and the Luth survey costing approximately \$18,800 in 2024. For the Luth survey, the type of response (email or phone) determines how much the survey costs. Email responses are \$4 each and phone responses are \$55 each.

- c. The Company has seen improvements since implementing the use of Qualtrics surveys. The most significant improvement is the overall CSAT score. This score went from 82% in 2023 to 88% in 2024. The Company attributes much of this improvement to using these transactional based surveys.

Another area of improvement is the overall customer experience. With the closed loop process, the customer has an opportunity to provide feedback, expressing concerns or issues that have arisen. When feedback is received by the Company, a call back from a supervisor to the customer is performed. The goal is to close the loop within 48 hours. With this real-time visibility, the Company has an opportunity to address customer concerns and take actions quickly to remedy any situation that arises.

- d. Please see the "Attachment DPS-369.pptx" for a sample Qualtrics report.

4. a. The Company is proposing to reintroduce the PRA on terminations and uncollectibles for its customer service performance metrics. The removal of the PRAs occurred during the COVID-19 pandemic since there was a termination moratorium, and the Company would have automatically been eligible to receive the PRA during that time. The Company suggests targets set at 422 for annual terminations and \$500,200 for uncollectibles, however would welcome the opportunity to work with DPS Staff on the best way to formulate appropriate metrics.

The prior methodology used to establish the termination target was based on a 3-year average, however due to the termination moratorium and the Company not performing terminations in 2020, 2021, and 2022, the Company proposes using the average of the last 5 years to establish the target.

The Company also proposes using the average of the last 5 years to establish the target for Liberty SLG's Responses to DPS-369, Page 4

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**DPS-369 continued.**

uncollectibles due to the Company experiencing a very high level of write-offs in 2024, making a 3-year average too high. The high level of write-offs was caused by the Company pausing write-offs during the COVID-19 emergency and the system conversion to SAP.

- b. The chart below shows the last 5 years of terminations and uncollectibles.
- Based on the previous methodology, the write-off data from 2019-2022 only includes residential heating customers with a balance >\$50 and did not include recoveries.
  - The methodology for 2023 and 2024 includes write-offs for all classes of customers and is the net of recoveries.

								Proposed PRA Targets	
Terminations	2019	2020	2021	2022	2023	2024	5yr Average	2019-2023-2024	
	294	13	0	26	588	385	218	422	
Uncollectibles	2019	2020	2021	2022	2023	2024	5yr Average	2019-2023-2024	
	\$254,000	\$56,000	\$124,767	\$40,167	\$16,761	\$ 1,229,951	\$286,941	\$500,237	

Name and Title of Person(s) Responsible for Response: Christine Downing Director, Customer Experience - East Region

Date: January 17, 2025

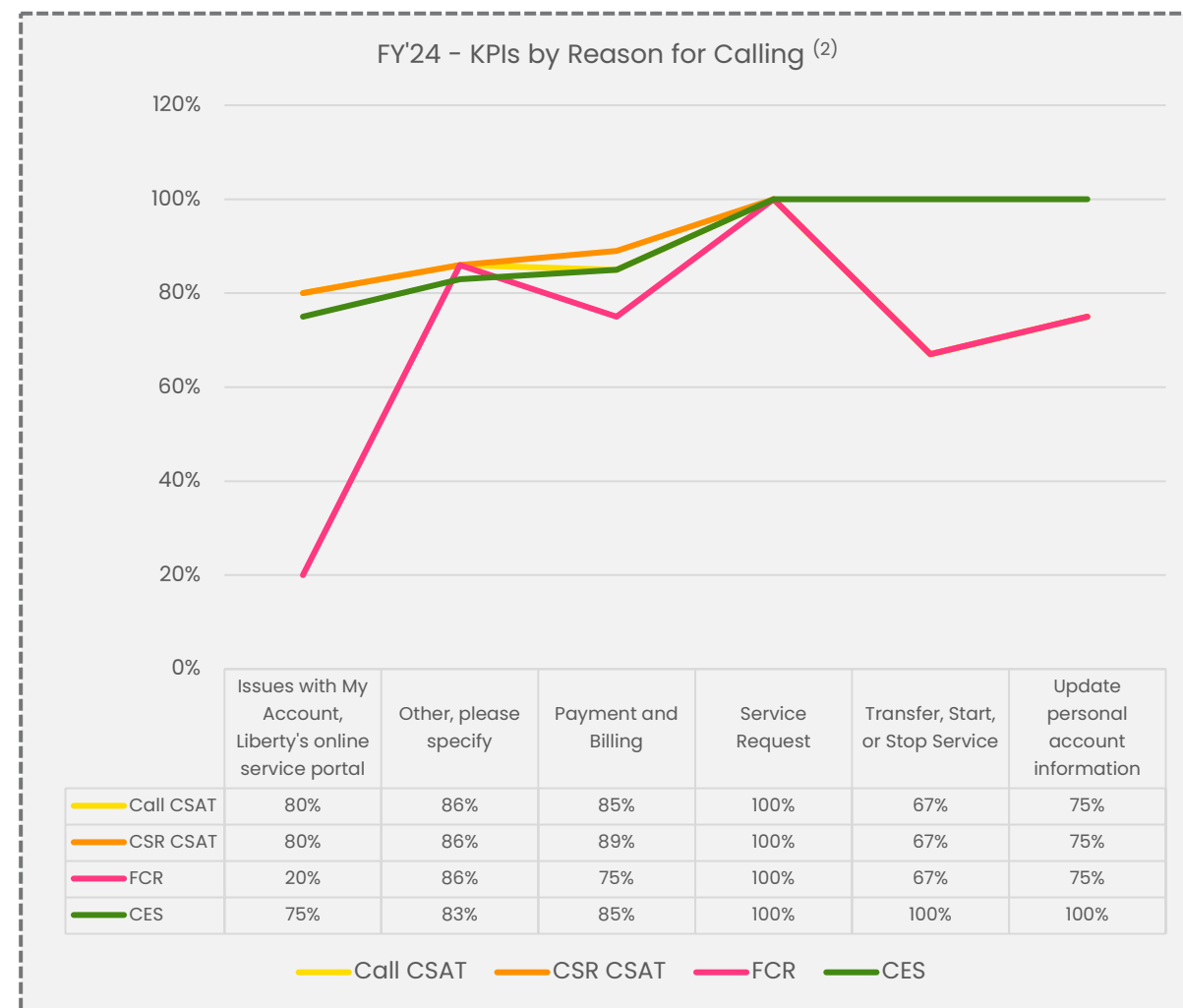
# New York Gas Results

Cumulative Data

KPIs	NY Gas Q1'24	NY Gas Q2'24	NY Gas Q3'24	NY Gas Q4'24
Surveys Sent	1639	2144	2999	3707
Responses	234	298	395	476
Response Rate	14%	14%	13%	13%
NPS	62	62	63	63
Call CSAT	83%	85%	87%	86%
CSR CSAT	86%	87%	88%	89%
FCR <sup>(1)</sup>	72%	75%	75%	77%
Customer Effort Score	82%	80%	78%	77%

## Summary

- NPS improved by 1 point in 2024. NY Gas has the highest NPS compared to other East Region operating companies
- Over 75% of customers reported being able to resolve issues on the first call
- Calls relating to Transfer, Start or Stop Service have the lowest satisfaction ratings, with Call CSAT and CSR CSAT being 67%
- Calls relating to My Account have the lowest FCR across all call reasons at 20%



Notes: The data presented in this report is cumulative. (1) As reported by customer survey response; (2) Question: 'What was the primary reason for your call?'

n = number of responses; GA Gas, n = 295; MA Gas, n = 154; NB Gas, n = 63; NH Electric, n = 125; NH Gas, n = 242; NY Gas, n = 75; NY Water, n = 253

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**Liberty Utilities (St. Lawrence Gas) Corp.  
24-G-0668  
Gas Rates**

**Request No.:** DPS-372  
**Requested By:** Anthony Mannarino  
**Information Requested of:** Kim Baxter  
**Date of Request:** January 02, 2025  
**Response Due Date:** January 13, 2025  
**Date of Response:** January 17, 2025  
**Name & Position of Respondent:** Christine Downing Director, Customer Experience -  
East Region  
**Subject:** Arrearage Management Program

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**LIBERTY UTILITIES (ST. LAWRENCE GAS) CORP.'S GENERAL DEFINITIONS**

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9. "Staff" shall mean DPS Staff.

**DPS-372**

1. Provide a detailed breakdown of the cost for the arrearage management program (AMP) provided on page 15 of Christine Downing's testimony.
2. Provided how the Company estimated that 232 of its customers would meet the eligibility requirements of the AMP provided on page 15 of Christine Downing's testimony.

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**Liberty Utilities (St. Lawrence Gas) Corp.  
24-G-0668  
Gas Rates**

**DPS-372 continued.**

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**Liberty SLG's Response to DPS-372.**

Liberty SLG hereby incorporates the General Objections. Subject to and without waiving any of the General Objections, Liberty SLG provides the following response:

1. Duplicate request. Please see DPS-317.
2. The Company identified 232 of its customers as currently meeting the eligibility criteria of the AMP program as it has been proposed. The Company identified these customers by reviewing all low-income customer accounts, identifying those in arrears who are greater than 30 days past due and are in arrears by \$300 or more. Based on this eligibility criteria, those 232 customers were identified as currently being eligible for the proposed program. The Company recognizes that this number will vary and will reassess our customer eligibility should the AMP program receive approval.

Name and Title of Person(s) Responsible for Response: Christine Downing, Director, Customer Experience - East Region

Date: January 17, 2025

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INTERROGATORY/DOCUMENT REQUEST**

**Liberty Utilities (St. Lawrence Gas) Corp.  
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Gas Rates**

**Request No.:** DPS-463  
**Requested By:** Anthony Mannarino  
**Information Requested of:** Kim Baxter  
**Date of Request:** January 23, 2025  
**Response Due Date:** February 03, 2025  
**Date of Response:** February 03, 2025  
**Name & Position of Respondent:** Christine Downing Director, Customer Experience -  
East Region  
**Subject:** AMP

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**DPS-463**

1. According to the Home Energy Assistance Program (HEAP) Manual Chapter 10, B, 1, b (1) a customer would only be eligible to receive emergency HEAP if the utility service for heating is scheduled for termination. On pages 12 to 14 of Christine Downing's testimony it states that customers enrolled in the AMP will be protected from service termination during their participation in the program but would be terminated from the AMP program if they fail to pay their agreed budget installment and may be only reinstated once. Provide a detailed description of the following:



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**Liberty Utilities (St. Lawrence Gas) Corp.**

**24-G-0668**

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- a. The process of how the Company will educate customers that they could lose their emergency HEAP benefit and why the AMP is more beneficial to customers. Include any outreach materials.
  - b. Provide if the Company would be willing to increase the one- time reinstatement for customers who missed payments for the AMP program to multiple reinstatements, especially for customers who would be eligible for emergency HEAP.
  - c. A Company plan for customers who are eligible to receive the emergency HEAP if eligible and be on the AMP program.
2. Based on Christine Downing's testimony on page 15, the total cost for the AMP program totals \$99,912; however, according to page 16 of Christine Downing's testimony, the Company only proposes to recover through base rates the communications cost of \$1,000 and the estimated \$72,912 for qualifying arrears but not the \$25,000 for IT cost. Provide a detailed explanation for the Company not seeking IT recovery cost as part of the AMP program.
  3. Provide the dollar amount and current number of low-income customers in arrears.

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INTERROGATORY/DOCUMENT REQUEST**

**Liberty Utilities (St. Lawrence Gas) Corp.  
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Gas Rates**

**DPS-463 continued.**

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**Liberty SLG's Response to DPS-463.**

Liberty SLG hereby incorporates the General Objections. Subject to and without waiving any of the General Objections, Liberty SLG provides the following response:

1.
  - a. The Company recognizes the potential risk of a customer losing their Emergency HEAP benefit if their account is auto-enrolled into the Arrears Management Program (AMP), which exempts them from collections. To address this, the Company will establish a streamlined review process, leveraging the lower volume of customers currently eligible for AMP, to evaluate accounts enrolled in the program and determine the most appropriate course of action.

If the customer's balance in suspense under AMP exceeds the Emergency HEAP benefit, it may be advantageous to temporarily remove the account from AMP, enabling the customer to receive a notice for emergency assistance. Once the assistance is secured, the customer could then resume participation on the AMP plan, and the HEAP benefit would be applied as payment for the missed budget installments.

If the customer's balance is less than the Emergency HEAP benefit, the Company could similarly remove the customer from AMP to allow the emergency benefit to cover the remaining charges.

Both scenarios would involve educating the customer about the process and ensuring they understand which option is in their best interest. Collections representatives will be thoroughly trained to guide customers through these discussions effectively.

At this time, the Company has not developed any communications materials related to these processes. However, if the AMP is approved, the Company will share all communications materials for review.
  - b. Yes, the Company is open to increasing the one-time reinstatement for the AMP program. To clarify, the one-time reinstatement rule does not apply to reinstatements after the customer catches up on missed budget payments. Instead, it applies to accounts that have successfully completed the AMP. Once a customer completes the program and all arrears are resolved, they would not be eligible to re-enroll in the program if they fall behind on their bill in the future.

Another scenario to mention involves customers who default on the plan due to non-payment. If they fail to catch up on their missed budget payments, they cannot be reinstated in the program without first making those payments. However, the proposal does not impose a limit on the number of times a customer can reinstate their participation in the program, provided they catch up on any missed budget payments.
  - c. The Company will establish a review process to proactively contact all customers enrolled in AMP who have not received an Emergency HEAP benefit. This process will involve discussing the customer's individual situation to determine the best course of action for their needs. Each account

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**DPS-463 continued.**

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will be handled on a case-by-case basis, with the primary goal of maximizing the assistance available to the customer.

In every instance, the Company will prioritize helping the customer secure the HEAP benefit. If applicable, the customer can then be re-enrolled in the AMP program to address any remaining charges after the emergency HEAP benefit has been applied.

2. The Company is proposing to recover all costs associated with the AMP, which includes the IT costs of \$25,000, for development and testing. The IT costs are included in the forecasted plant additions as part of IT capital.
3. There are currently 350 low-income customers in arrears, totaling \$160,027.60.

Name and Title of Person(s) Responsible for Response: Christine Downing Director, Customer Experience - East Region

Date: February 03, 2025