

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

Proceeding on Motion of the Commission as
to the Rates, Charges, Rules and Regulations
of Liberty Utilities (New York Water) Corp.
for Water Service

Case 23-W-0235

**PETITION OF LIBERTY UTILITIES (NEW YORK WATER) CORP. FOR
AUTHORIZATION TO TRANSITION TO TRANSACTION-BASED
CUSTOMER SATISFACTION SURVEY IN RATE YEARS 2 AND 3**

Jeffrey R. Greenblatt
Liberty Utilities Service Corp.
60 Brooklyn Ave
Merrick, New York 11566
Tel: (516) 243-2142
Email: Jeffrey.Greenblatt@libertyutilities.com

Dated: August 13, 2025
Merrick, New York

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

Proceeding on Motion of the Commission as
to the Rates, Charges, Rules and Regulations
of Liberty Utilities (New York Water) Corp.
for Water Service

Case 23-W-0235

**PETITION OF LIBERTY UTILITIES (NEW YORK WATER) CORP. FOR
AUTHORIZATION TO TRANSITION TO TRANSACTION-BASED
CUSTOMER SATISFACTION SURVEY IN RATE YEARS 2 AND 3**

Liberty Utilities (New York Water) Corp. (Liberty NYW or the Company) respectfully submits this petition to the New York State Public Service Commission (Commission) requesting authorization to transition to the transaction-based customer satisfaction survey beginning in Rate Year (RY) 2 and continuing into RY3, pursuant to the terms outlined in the Commission's *Order Adopting Terms of Joint Proposal and Establishing Rate Plan*, issued and effective August 15, 2024, in Case 23-W-0235 (Order).¹ The Order approved a Joint Proposal (JP)² establishing a three-year rate plan for Liberty NYW, running from April 1, 2024, through March 31, 2027, with RY1 encompassing the 12-month period ending on March 31, 2025, RY2 the 12-month period ending on March 31, 2025, and RY3 the 12-month period ending on March 31, 2027.³

I. Background

As required by the Order, Liberty NYW initiated a pilot program in RY1 to evaluate a transaction-based email survey targeted to customers following recent interactions with the

¹ Case 23-W-0235, Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Liberty Utilities (New York Water) Corp. for Water Service, Order Adopting Terms of Joint Proposal and Establishing Rate Plan (Issued and Effective August 15, 2024).

² The Joint Proposal is appended to the Order as Attachment 1.

³ JP, p. 5.

Company. The goal of the pilot was to benchmark customer satisfaction using a real-time, event-triggered format. The survey included a single key question:

“Thinking about your most recent call center interaction with Liberty, how satisfied are you”

Responses were measured on a five-point scale, from 1 (“Very Dissatisfied”) to 5 (“Very Satisfied”), with performance results measured by the percentage of customers selecting “Satisfied” or “Very Satisfied.”

The Order required Liberty NYW and Department of Public Service (DPS) Staff to meet twice during RY1 - once in September and once in February - to review pilot results and discuss the potential transition to a full transaction-based survey in RY2 and RY3.⁴ A decision to transition was to be made by March 7, 2025, with confirmation filed in this proceeding.⁵

II. Request for Relief

Due to scheduling constraints, Liberty NYW and DPS Staff were unable to hold the required meetings before the March 7, 2025, deadline. However, both parties remained in regular communication and actively monitored the Pilot’s progress. Collaborative meetings were held on September 11, 2025, and March 25, 2025.

The Pilot yielded encouraging results, including strong customer participation and consistent satisfaction scores. The transaction-based format proved to be more responsive and cost-effective than traditional survey methods, enabling Liberty NYW to capture and act on customer feedback more promptly. Under the traditional annual survey, the response rate was 1.4%, resulting in 1,500 respondents. By contrast, the transactional survey achieved an 11% response rate with 1,913 respondents. Transitioning fully to the transaction-based survey model would result in

⁴ JP, p. 27.

⁵ JP, p. 28.

immediate cost savings of approximately \$33,000. Its streamlined structure and timely delivery, shortly after customer interactions, support a more accurate and actionable measure of the customer experience. Additionally, the integrated closed-loop follow-up process allows the company to address customer concerns more quickly when dissatisfaction is indicated in survey responses.

As of the most recent meeting with the Company, DPS Staff expressed support for transitioning to the transaction-based survey approach. Liberty NYW appreciates that support, as the Company believes this transitioning is in the best interest of customers and aligns with its ongoing commitment to continuous service improvement. Implementing this approach in RY2 - even mid-year - ensures that customer feedback is captured in a way that better informs service improvements, which is ultimately in the public interest. Liberty NYW has consistently demonstrated a commitment to enhancing service quality. The transaction-based survey is a more modern and responsive tool and delaying its implementation until RY3 would unnecessarily postpone benefits to customers and the Company's ability to act on real-time feedback. The Company is prepared to implement the transaction-based survey immediately and has the necessary systems and processes in place. This readiness supports the argument that the transition can be made smoothly and without delay.

Accordingly, Liberty NYW respectfully requests that the Commission:

- 1) Authorize the Company to transition to the transaction-based survey format for RY2 and RY3, notwithstanding the missed March 7, 2025, deadline; and
- 2) Permit use of the new Negative Revenue Adjustment (NRA) targets below, established for RY2 retroactively, in accordance with the terms of the Joint Proposal.

Transaction-based Email Survey			
Target	Negative Revenue Adjustment (NRA) Basis Points		
	RY1	RY2	RY3
>= baseline	n/a	0	0
< baseline	n/a	2.5	5
< baseline less 3%	n/a	5	10
< baseline less 6%	n/a	10	15

Transaction-based Email Survey			
Target	Negative Revenue Adjustment (NRA) Basis Points		
	RY1	RY2	RY3
>=baseline (66%)	n/a	0	0
64% - 65%	n/a	2.5	5
61% - 63%	n/a	5	10
<= 60%	n/a	10	15

III. Conclusion

Liberty NYW remains committed to transparency, accountability, and enhancing customer satisfaction. The Company believes that transitioning to the transaction-based survey will further these goals and respectfully requests approval to proceed as outlined above.

Respectfully submitted,

Attorney for Liberty Utilities (New York Water) Corp.

Jeffrey R. Greenblatt
Jeffrey R. Greenblatt

Liberty Utilities Service Corp.

60 Brooklyn Ave

Merrick, New York 11566

Tel: (516) 243-2142

Email: Jeffrey.Greenblatt@libertyutilities.com