#### AUSTIN ENERGY'S TARIFF PACKAGE: 2015 COST OF SERVICE STUDY AND PROPOSAL TO CHANGE BASE ELECTRIC RATES

# BEFORE THE CITY OF AUSTIN IMPARTIAL HEARING EXAMINER

#### AUSTIN ENERGY'S RESPONSE TO AE LOW INCOME CUSTOMERS' SECOND REQUEST FOR INFORMATION

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Austin Energy ("AE") files this Response to AE Low Income Customers' ("AELIC")

Second Request for Information submitted on February 25, 2016. Pursuant to an agreement of

the parties, this Response is timely filed.

AUSTIM ENERGY 2016 MAR 10 PM 12: 35 Respectfully submitted,

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#### ATTORNEYS FOR AUSTIN ENERGY

#### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this pleading has been served on all parties and the Impartial Hearing Examiner on this 10th day of March, 2016, in accordance with the City of Austin Procedural Rules for the Initial Review of Austin Energy's Rates.

HANNAH M. WILCHAR

- AELIC 2-1. According to the tariff language, the prepayment rate schedule will be available on a voluntary basis. Please explain how customers will volunteer. In your explanation please address the following:
  - A. How will customers be informed of the opportunity to volunteer?
  - B. Describe the process for development of consumer education and consumer information materials.
  - C. When will the opportunity to volunteer for the pilot open?
  - D. When will the opportunity to volunteer close?

#### ANSWER:

- A. Volunteers will be notified via a marketing campaign developed by Customer Care in collaboration with Austin Energy's Corporate Communications business unit. This campaign is currently being developed. How the marketing campaign will be disseminated is not yet determined.
- B. Consumer education and consumer information materials will be created by using lessons learned and samples obtained from other utilities with a prepaid program and the vendors who are participating.
- C. Enrollment is slated to begin April 1, 2016.
- D. Due to the brevity of the pilot, enrollment will end April 30, 2016 depending upon if the maximum number of participants of 300 is reached.

Prepared by:	RM
Sponsored by:	Kerry Overton

AELIC 2-2. The tariff language restricts eligibility to residential customers who "receive water and wastewater service from a non-City of Austin provider." Please explain why the pilot is targeted to this subset of customers. In your explanation please provide the total number of residential customers, both inside and outside the city, who would be eligible to participate in the pilot.

# ANSWER:

During the pilot, AE anticipates being able to use electric two-way meters installed in the recent Advanced Metering Infrastructure implementation which will allow for remote disconnect/reconnect capability. Currently, Austin Water Utility does not have meters with this remote feature so the pilot is not open to City of Austin water and wastewater customers at this time. Customer participation targets are currently being developed by AE Customer Care in collaboration with the AE Data Analytics & Business Intelligence workgroup (DABI). Therefore, the total number of eligible residential customers is yet to be determined.

AELIC 2-3. The tariff language does not restrict eligibility to residential customers who receive solid waste services from a non-City of Austin provider. Please explain why this restriction on eligibility was not included in the tariff but that a non-City water and wastewater service restriction was included. In your explanation please address how billing and collection for solid services will occur for residential customers who volunteer to take service under the prepayment tariff and who also are solid waste customers of the City of Austin.

#### ANSWER:

The pilot is not open to City of Austin water and wastewater customers for the reasons provided in AE's Response to AELIC 2-2. This issue does exist for City of Austin solid waste customers because solid waste service is not metered.

Non-metered City of Austin services, including solid waste service, will be prorated for prepaid participants.

- AELIC 2-4. Please explain why the pilot prepayment tariff will only be available "for a term of no more than 9 consecutive billing cycles." In your explanation, please address the following:
  - A. Why was a 9 month period chosen?
  - B. What 9 months of AE's FY will cover the pilot period?
  - C. Why does the pilot last less than one year?
  - D. If the pilot begins after approval and implementation of the rates, the start date is likely to be in the fall of 2016, and end prior to the peak usage months of summer in 2017, correct?
  - E. What happens to the volunteers at the end of the 9 month period? In your explanation include whether they will return to post-paid service. Also address volunteers who at the end of the 9 month period have not completed the payment arrangement for past due bills and still have an amount owing to AE at the end of the 9 month period.

# ANSWER:

- A. The Prepaid Rates schedule was created in July 2015. At that time, the pilot was not slated to go live until January 2016, which would have allowed 9 months of consecutive billing cycles ending with the end of the fiscal year on September 30, 2016.
- B. The pilot is scheduled to run from May to September 2016 (5 months).
- C. In researching other utility prepaid programs, pilots were as brief as 60 days and up to one year. Based on its research, AE determined, a 4-6 month pilot would be sufficient to gather the knowledge needed to decide whether to move to full deployment.
- D. No, governed by the Prepaid Rate Schedule in effect since November 1, 2015, the anticipated go-live is May 1, 2016. The pilot will be active during the peak usage months of summer 2016.
- E. Volunteers will be converted back to postpaid service at pilot end. Customers with a pre-existing debt balance when enrolled in the pilot will be part of a debt recovery feature in which a percentage of each payment will go towards their past due balance. Upon the close of the pilot, customers who enrolled with past due balances will be converted to a payment arrangement based on the current Payment Arrangement Policy.

AELIC 2-5. Please explain what happens to a volunteer's electric service when the volunteer fails to pay his/her solid waste service bill. In your explanation please address how, if at all, this failure to pay would affect the volunteer's transition to post-paid electric service from AE.

# ANSWER:

This scenario is not possible because customers do not have the option to pay for one service or a subset of services; customers' payments are applied against the entire bill. Non-metered charges are prorated in the prepaid solution and would be included as a part of daily charges and the amount due at any particular time during the month. Upon the close of the pilot, customers who enrolled with past due balances will be converted to a payment arrangement based on the current Payment Arrangement Policy.

Prepared by:	RM
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AELIC 2-6. Should a volunteer want to withdraw from the pilot project, what steps will the volunteer need to take to transition to AE's post-paid electric service? In your explanation, please address whether the volunteer will be required to pay a deposit; and if so, how much; and whether a deposit would be required even if the volunteer has been timely paying for his/her service for a combination of months with the pilot project and with previous AE post-paid service equal to or greater than twelve months at the time the transition is sought.

# ANSWER:

The steps a volunteer will need to take to transition to AE's post-paid electric service have not yet been determined. AE Customer Care is currently working with the Prepaid Executive Steering Committee on this matter as well as conducting research to determine best practices.

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AELIC 2-7. The prepaid tariff states that "[p]articipation will be limited to 300 individuals on a first-come, first served basis." Please explain why the number 300 was chosen for the pilot participants. In your explanation, please explain how the 300 pilot participants will be representative of the eligible customer base.

#### ANSWER:

The number of participants is based upon feedback from other utilities as to the optimal number of customers that is manageable during a manual pilot program. AE Customer Care is working in collaboration with the Data and Business Intelligence workgroup regarding the selection of the subset of customers for the pilot.

AELIC 2-8. Under the prepayment tariff, a participant will be required to establish a prepayment credit balance. Please explain how AE will calculate that prepayment credit for the participant. In your explanation please address whether the prepayment credit will vary depending upon characteristics of the volunteer participant such as the participant's usage histories or his/her payment histories. How will the level of a prepayment credit compare to the level of the deposit required in AE's post-paid residential retail service for the AE customer who decides to be a prepayment volunteer.

#### ANSWER:

How AE will calculate a participant's prepayment credit has not yet been determined. AE Customer Care is currently reviewing minimum credit balances for other prepaid programs across the nation to determine the best practice. AE Customer Care is working with the Prepaid Working Committee on this matter.

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AELIC 2-9. The prepayment tariff states, "[d]eposits previously paid to Austin Energy shall be returned to the customer or may be applied to the permanent balance at the customer's request." Will a pilot customer who returns to post-paid service be required to supply another deposit to AE?

#### ANSWER:

Whether a pilot customer who returns to post-paid service will be required to supply another deposit to AE has not yet been determined. AE Customer Care is currently working with the Prepaid Executive Steering Committee to review best practices across the country and determine the process for the prepaid pilot.

AELIC 2-10. According to the prepayment tariff, "[o]utstanding balances must either be paid prior to enrollment or will be placed on a deferred payment plan with a fixed percentage of all future payments applied to the outstanding balance." Please describe in detail how the "fixed percentage of all future payments" will be calculated. Please describe how the payment on the deferred payment plan will be applied in relation to the pilot participant's billing charges. In your description of the level of payments, please address whether: AE will take into consideration the customer's ability to pay; the amount of the outstanding balance; the payment timelines under a deferred payment plan as a pilot participant versus the payment timelines as an AE post-paid service customer for a comparable post-paid outstanding balance.

#### ANSWER:

The fixed percentage is currently being determined by the Prepaid Working Committee. The Prepaid Vendor offers a debt recovery module which will take a percentage of each payment and apply it towards the past due balance.

Outstanding debt will be aggregated with the current charges of the prepaid program and billed to the customer as one total amount due. Payments against that total amount due will be applied according to a fixed percentage basis that will be established at the outset of the program.

One of the major benefits of a prepaid account is that it empowers the customer to pay what he/she can when they can to ensure payments are being made towards the customer's bill. It allows the customer to make payments based upon their schedule and at intervals when the customer has an income stream available.

AE Customer Care is currently working with the Prepaid Working Committee to determine whether we will require a capped debt balance when enrolling.

AELIC 2-11. The prepayment tariff states, "[p]repayment participants are not eligible for new payment arrangements or credit extensions." Why are prepayment tariff participants limited in their ability to re-negotiate their payment arrangements or credit extensions? In your explanation please address whether AE will provide prepayment tariff participants a grace period like the grace period AE provides for post-paid participants, and if not, why not. Also please address in your explanation why a prepayment tariff participant cannot have the same customer protection rights to renegotiate a deferred payment plan as post-paid customers (see Utility Code, §15-9-144).

# ANSWER:

Prepaid participants who are on a payment arrangement will have to release their current payment arrangement in order to participate in the pilot. So by releasing the payment arrangement there is no need to renegotiate.

Prepaid pilot participants would not be on a payment arrangement at the same time they are participating. Our current grace period is only applicable to active payment arrangements.

Payment arrangements are inconsistent with the underlying concept of a prepaid program because pilot participants are expected to pay for service in advance and cannot use more than what for which they have already paid. As such, there is no functionality for payment arrangements included in the vendor's prepaid program software.

AELIC 2-12. According to the prepayment tariff, AE intends to apply the City Utility Code (Chapter 15-9) unless in conflict with the prepayment tariff. Please identify each section and subsection, if relevant, of the City utility code that AE will apply to the prepayment tariff participants. For instance, will AE charge the prepayment tariff participants late fees or reconnection fees, or will AE not disconnect service on a prepayment tariff service at a time when personnel are not available to restore service.

## ANSWER:

The Prepaid Working Committee is currently reviewing best practices about fees and other aspects of the programs. AE cannot currently identify specific sections of the Code that will be applied to pre-payment participants. However, Austin Energy does not conduct normal business during weekend and holiday hours. Any account activity, including payments for prepaid accounts, will be processed normally once regular operations commence as is in the postpaid environment.

AELIC 2-13. Will a prepayment tariff participant with a deferred payment arrangement be able to transition to post-paid service before the deferred payment arrangement is completed; and if so, will the transitioned post-paid service customer be able to renegotiate his/her deferred payment arrangement?

#### ANSWER:

Yes, a prepaid tariff participant with a deferred payment arrangement will be able to transition to post-paid service before the deferred payment arrangement is completed.

In a postpaid environment, there are limited instances in which a customer is able to renegotiate a deferred payment arrangement. Typically, deferred payment arrangements are renegotiated if there has been a credit to the account balance which the customer wishes to apply to a debt balance. In terms of "resetting" a payment arrangement, it would depend upon what their payment arrangement status was upon enrollment based on our current policy. A customer going back to postpaid will still have the same payment arrangement available as they did prior to enrollment in the prepaid program.

AELIC 2-14. The prepayment tariff provides participants a "true-up' paper or electronic monthly bill. Please describe how the billings or "true-up" paper will look and how its appearance will compare with comparable post-paid customer billings. Also address whether the bills will show the daily usage and identify all payments made.

#### ANSWER:

During the prepaid pilot, the customer will receive an identical monthly statement to the monthly statement currently received by all postpaid customers. Bills will not show daily usage or identify all payments made. However, see AE's Response to AELIC 2-15 for how customers can view their daily account balances.

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AELIC 2-15. The prepayment tariff states that account balances will be able to be checked through a prepayment web portal 24 hours a day. Please describe how this process will be set up. In your description address how often the account balances will be updated (hourly? daily?) and also address the usability of the web portal for customers who are low income and/or with little education and/or with visual disabilities and/or whose primary language is not English. Please also include what alternative to internet access-based monitoring of usage will be available. In other words, how will AE provide customers usage/account balance information who do not have access to the internet?

# ANSWER:

AE is currently designing the web portal with the identified vendors and has not determined all aspects of the process. As of now, account balances will be updated every 24 hours. AE intends to design the web portal so that it is accessible to all customers. AE provides assistance to non-English speaking customers through its translation service.

Customers who do not have access to the internet will be able to receive alerts regarding their usage and account balance by telephone or text message. Each customer with a prepaid account creates an alert profile that specifies the types of alerts the customer wishes to receive, including a low balance alert at a threshold set by the customer. Customers may choose their preferred alert delivery method and the time of day the customer wants to receive the alert. Customers may choose to receive alerts in English or Spanish via an automated telephone call, SMS text message, or email. During the account creation process, the service representative will assist the customer in selecting the desired alerts, delivery methods and delivery times. Customers will be required to maintain their own alert profile, but an authorized AE representative may do it for them if they have a disability. These details will be explained as part of the customer's education process.

AELIC 2-16. Will a prepayment tariff participant have access to payment assistance programs from AE? If so, please explain how it will work.

#### ANSWER:

Customers receiving a discount on their bill pursuant to enrollment in the Customer Assistance Program at the time of prepaid program enrollment will not be eligible to participate in the prepaid pilot. However, customers receiving Plus 1 financial assistance will be able to participate in the prepaid program. Ability to participate in the Plus 1 program will not be changed or impacted by participation in the prepaid program.

AELIC 2-17. Does AE know if a prepayment tariff participant will have access to payment assistance programs from community or government agencies? If so will the payment assistance provided be adapted to a prepaid program? If AE does not know, please explain what steps AE took to determine whether a prepayment tariff customer would be able to obtain payment assistance from community or governmental agencies.

#### ANSWER:

Customers receiving a discount on their bill pursuant to enrollment in the Customer Assistance Program at the time of prepaid program enrollment will not be eligible to participate in the prepaid pilot. However, customers receiving external governmental financial assistance will be able to participate in the prepaid program. Ability to receive external governmental financial assistance will not be changed or impacted by participation in the prepaid program.

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AELIC 2-18. The prepayment tariff states, "[p]repayment pilot customers will receive notifications and alerts about their account." Please describe in detail the types of alerts and notifications that would be provided. In your description, please address the timing and number of the alerts AE will provide. Please also address once AE realizes the AE customer no longer has phone or internet service, what steps will the utility take such as second contact information to ensure prepaid tariff customer receives the alerts and notifications. Please include how AE will provide alerts to customers with disabilities, and/or with little education, and/or whose primary language is not English.

#### ANSWER:

AE may customize alerts as needed for high usage, negative balance, upcoming rate changes, etc. Alerts will be configured to contain hyperlinks to take the customer to a payment site. Customers may choose to receive alerts in English or Spanish via an automated telephone call, SMS text message, or email. AE provides assistance to non-English speaking customers through its translation service. If an alert of any type is scheduled for delivery and the trigger for that alert type changes, any pending alert is cancelled based on the outcome of the transaction. Austin Energy will be able to monitor bounce back notifications. However the customer will be responsible for updating AE with any changes to their account status as is the case with postpaid customers now. This issue will be part of the final evaluation to determine how to handle these customers in a full functioning prepaid environment.

AELIC 2-19. According to the prepayment tariff, "Austin Energy will notify program participants when the prepayment account balance is at or below a predetermined threshold." Please explain how that threshold is calculated and how notice will be provided. In your explanation, please address whether the customer or Austin Energy determines the threshold and whether the customer will receive one notice or more than one notice. Please address how and when the notice(s) will be provided, including addressing how AE will notify customers with disabilities and/or with little education or whose primary language is not English.

# ANSWER:

The customer will have the option to determine the threshold and how often they wish to be notified. Notification will be through their selected alert method as discussed in Austin Energy's Responses to AELIC 2-15 and AELIC 2-18.

AELIC 2-20. The prepayment tariff states, "Austin Energy may disconnect a customer's utility service without notice if the account reaches a zero or negative balance." Why doesn't Austin Energy provide a notice of disconnection in the same manner it provides a low balance notice?

#### ANSWER:

AE will provide notice of pending disconnection through an alert as discussed in Austin Energy's Response to AELIC 2-18. Customers may choose to receive alerts in English or Spanish via an automated telephone call, SMS text message, or email.

AELIC 2-21. According to the prepayment tariff, "[p]repayment customers will have access to existing Austin Energy payment options. It is the customer's responsibility to allow enough time for payment processing." Please list each payment option offered by Austin Energy.

Please see Austin Energy's Response to AELIC 2-22.

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AELIC 2-22. For each payment option identified in No. 2-21, please provide the following:

- A. Please list any fees associated with the option, including processing fees that may be charged by a 3rd party vendor-collection agent (like AE bill collections at H.E.B. grocery stores).
- B. Please provide the processing time—that is the time period from the first receipt of payment by AE or its collection agent from the AE customer to the time AE processes the payment and credits the customer's account for purposes of maintaining the customer's electric service or for purposes of reconnecting the service. In your descriptions, please address how the processing time is affected, if any, from customer payments made outside business hours, on weekends, and on holidays.

A.		
Payment Option	Fee/Limit	Posting Time
Auto Pay	No Fee, Drafts Current Balance of each bill	2 Business Days
Online Customer Care – Bank Account E-Debit	None	2 Business Days
Online Customer Care – Quick Payment	\$3.25 <sup>•</sup>   None	Next Business Day for payments made before 5pm
Online Customer Care – Quick Payment	\$3.49 Fee <sup>*</sup>  \$1000 transaction limit   limit 3 payments per day, 5 per month	1 Business Day
IVR / Telephone	\$3.49 Fee <sup>*</sup>  \$1000 transaction limit   limit 3 payments per day, 5 per month	1 Business Day
Pay Station	Service Charge, Usually About \$1 / \$2500 transaction limit	Next Business Day
Branch Offices (North Branch, East Branch)	None	Same Day
Drop Box (625 EAST 10TH ST, 505 BARTON SPRINGS RD.)	None	Once Received – Next Business Day (Same Day In House)
Envelope / Mail	Cost of Postage	Once Received – Depending on Post Office (Same Day In House)

#### ANSWER:

<sup>\*</sup> These contractual fees are charged by non-City of Austin third parties.

B. Austin Energy does not conduct normal business during weekend and holiday hours. Payments for prepaid accounts will be processed normally once regular operations commence as is in the postpaid environment.

AELIC 2-23. What is the time deadline for AE to reconnect a prepayment tariffed customer once the utility has processed the payment? In answering this question please identify whether there would be differing times depending upon whether the payment was processed: at the end of the day or after the close of the business day; or whether the day after the day AE processed the payment is a week-end or a holiday?

## ANSWER:

Austin Energy will be handling the reconnect/disconnect process through our Advanced Metering Infrastructure system using our two-way communicating meters. The payment notification process is currently under development. As of now, if a customer makes a payment prior to 9:00 p.m., their service would be turned on same-day. We are currently working through the logistics of this process and will have a final process developed in collaboration with the Working and Executive Steering Committees prior to implementation.

Austin Energy does not conduct normal business during weekend and holiday hours. Payments for prepaid accounts will be processed normally once regular operations commence as is in the postpaid environment.

- AELIC 2-24. The prepayment tariff sets out a series of daily charges that include a customer charge and a five-tiered base rate charge, referred to as "energy charges." Please explain how the tiers of "energy charges" were developed. In your explanation please provide the underlying workpapers, including any data or analysis used to establish the daily tiers and their respective rates. Also, in your explanation please address the following:
  - A. What safeguards, if any, did AE utilize in developing its energy tiers to ensure prepayment AE residential customers did not pay more a month through the AE prepayment charges on a daily basis than if the customer was an AE post-paid customer?
  - B. Whether AE in developing its tiered energy charges took into consideration the savings AE realized from receiving revenues before the services were provided as opposed to receiving revenues after the services were provided for the post-paid services, and if so, how was the savings factored into the rates; and if not, why not.
  - C. Why AE's tiered energy charges appear to double count some kWh usage by overlapping the end of the tier with the beginning of the next tier. (For example, instead of 0-16, 16-33, shouldn't the first tiers be 0-16 and 17-33? And shouldn't the other tiers be established that way as well?)

#### ANSWER:

The prepaid pilot establishes the tiers by taking the current residential tiers and multiplies them by 12 and then divides that number by 365 to get a daily tier (rounded to the nearest whole value); this same method is applied to the customer charge. The rest of the energy charges reflect the same values as in the standard residential rate schedule.

- A. Customers will receive a monthly 'true-up' statement, that will take the customer's daily usage for the month and apply it through the standard rates, for which, the difference between what they paid and what they would have paid will be passed on to the customer, as stated in the rate schedule, "Participants in the prepaid pilot program will receive a 'true-up' paper or electronic monthly bill."
- B. Part of the process of Austin Energy's prepaid pilot is to evaluate whether this type of program works for Austin Energy, its customers, the costs and benefits from providing such a program, and analysis of customer behavior change (i.e., less disconnects, insufficient funds, and missed payments). If there are any savings, they are currently reflected in the waivers of the disconnect fee and security deposits under the rate schedule.
- C. There is no overlap or double counting. This is an oversight reflected in the rate schedule alone, which will be corrected within the City Council approved tariff.

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Sponsored by:	Kerry Overton

AELIC 2-25. Please provide the costs of the prepayment tariff pilot, broken out by O & M and capital expenses. Separately identify the costs of the web portal, staffing costs, and costs of consumer education materials. Please identify any incremental costs and/or savings, if any, AE anticipates occurring to serve the prepayment tariff customers.

#### ANSWER:

The all-inclusive budget for the pilot is \$57,999. How the budget will be allocated to separate costs has yet to be determined but is currently being developed by AE.

Any incremental costs and/or savings are unknown at this time. Part of the process of Austin Energy's prepaid pilot is to evaluate whether this type of program works for Austin Energy, its customers, the costs and benefits from providing such a program, and analysis of customer behavior change (i.e., less disconnects, insufficient funds, and missed payments).

- AELIC 2-26. How will AE evaluate the pilot upon completion? Please provide the evaluation methodology and criteria. In providing the methodology and criteria, please provide the following:
  - A. For example, will AE conduct customer satisfaction surveys?
  - B. Who will conduct the evaluation?
  - C. Will AE hire an outside consultant?
  - D. Will AE compare the revenues realized and the underlying kWh usage of the prepayment pilot project with the revenues realized and the underlying kWh usage of the postpaid customers? And will the comparison include comparing comparable kWh usage patterns. (For instance, comparing postpaid and prepayment customers using 500 kWh per month or less, etc.)
  - E. Will AE track the number of disconnections and the time lapse between disconnections and reconnections for the prepayment tariffed customers? (i.e. customers' services were disconnected "x" times during the pilot program and the time between disconnection and reconnection ranged between "x" and "y" with an average of "Z" and a median average of "Q". The total time between disconnection and reconnection for the prepayment tariff customers was "w.")
  - F. Will AE compare the disconnections and the time lapses between disconnections and reconnections of the prepayment tariffed customers with the postpaid AE customers?

# ANSWER:

The evaluation component of the pilot is still being developed and many of the questions below are still being discussed as to how we would acquire, maintain, and analyze this information in the context of this pilot.

- A. AE intends to conduct an email-based customer satisfaction survey.
- B. Austin Energy DABI workgroup.
- C. No, internal research staff will complete the task.
- D. DABI will be tracking energy savings.
- E. Evaluation design is currently under development.
- F. Evaluation design is currently under development.