**EXH. GJZ-3T  
DOCKETS UE-170033/UG-170034  
2017 PSE GENERAL RATE CASE  
WITNESS: GREG J. ZELLER**

**BEFORE THE**

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

|  |  |  |
| --- | --- | --- |
| **WASHINGTON UTILITIES AND**  **TRANSPORTATION COMMISSION,**  **Complainant,**  **v.**  **PUGET SOUND ENERGY,**  **Respondent.** |  | **Docket UE-170033**  **Docket UG-170034** |

**PREFILED REBUTTAL TESTIMONY  
(NONCONFIDENTIAL) OF**

**GREG J. ZELLER**

**ON BEHALF OF PUGET SOUND ENERGY**

**AUGUST 9, 2017**

**PUGET SOUND ENERGY**

**PREFILED REBUTTAL TESTIMONY**

**(NONCONFIDENTIAL) OF**

**GREG J. ZELLER**

**CONTENTS**

[I. INTRODUCTION 1](#_Toc489879927)

[II. PSE’S SQI NO. 5 PERFORMANCE AND ITS PROPOSED MODIFICATION TO SQI NO. 5 4](#_Toc489879928)

[III. PSE’S RESPONSE TO PUBLIC COUNSEL’S RECOMMENDATIONS FOR ADDITIONAL CUSTOMER PERFORMANCE BENCHMARKS 9](#_Toc489879929)

[A. The Commission Should Reject Public Counsel’s Proposal to Require 80 Percent of Calls to be Answered in 30 Seconds 11](#_Toc489879930)

[B. The Commission Should Reject Public Counsel’s Proposal to Initiate a New Standard for Abandoned Calls 19](#_Toc489879931)

[IV. CONCLUSION 20](#_Toc489879932)

**LIST OF EXHIBITS**

Exh. GJZ-4 Public Counsel Response to PSE Data Request No. 7

Exh. GJZ-5 Public Counsel Response to PSE Data Request No. 9

**PUGET SOUND ENERGY**

**PREFILED REBUTTAL TESTIMONY**

**(NONCONFIDENTIAL) OF**

**GREG J. ZELLER**

# I. INTRODUCTION

Q. Are you the same Greg J. Zeller who submitted prefiled direct testimony on January 13, 2017, on behalf of Puget Sound Energy (“PSE”) in this proceeding?

A. Yes, I submitted the direct testimony and supporting exhibits referenced as GJZ-1T and GJZ-2.

Q. What is the purpose of your rebuttal testimony?

A. The purpose of my testimony is to rebut assertions raised regarding PSE’s proposed edits to Service Quality Index No. 5, Customer Access Center Answering Performance (“SQI No. 5”). Specifically, my rebuttal testimony addresses the response testimonies of Barbara J. Alexander, Exh. BRA-1T, filed on behalf of Public Counsel, and Andrew Roberts, Exh. AR-1T, filed on behalf of the Staff of the Washington Utilities and Transportation Commission (“Staff”).

Q. Please summarize your rebuttal testimony.

A. Delivering the highest quality of customer experience to all customers has always been PSE’s focus. Providing additional self-service capabilities through a variety of channels that align with customer preferences helps PSE achieve its target of meeting customers’ expanding communication needs. Since the launch of its new customer information system (“CIS”) technology platform in 2013, PSE has been working to enable additional customer preference channel transactional capabilities.

As explained in Section VII of my Prefiled Direct Testimony, Exh. GJZ-1T, there is a segment of PSE customers who desire additional self-serve communication options, and this segment is growing significantly. PSE is investing in the development of additional customer self-serve capabilities through PSE’s Get to Zero initiative, which is explained by David E. Mills in his prefiled direct and rebuttal testimonies, Exh. DEM-1T and Exh. DEM-3T.

Service quality indices provide PSE a quantifiable assessment of customer satisfaction and service quality performance. SQI No. 5 was developed to measure PSE’s ability to respond to customer calls in a timely manner by setting a benchmark that 75 percent of all customer calls will be answered by a customer service agent within 30 seconds. However, as a standalone measure of PSE’s ability to respond to customers, SQI No. 5 has become an outdated metric because technology and customer preferences have evolved beyond a telephone call to an agent. Customer service technology has progressed to the point where organizations are able to manage the transaction level interaction with customers who are leveraging 24/7 self-serve communication channels using smart phones, web, and the automated telephone integrated voice response (“IVR”) capabilities.

Q. Please summarize other parties’ responses to the service quality standard modifications PSE has proposed in this proceeding.

A. PSE proposes one modification to its service quality indices in this proceeding, and that is to include IVR transactions in the calculation for SQI No. 5. Staff and Public Counsel are the only parties who responded to PSE’s proposal. Staff opposes PSE’s proposal, and I address Staff’s testimony later. Public Counsel’s witness, Barbara Alexander, goes beyond responding to PSE’s single proposal and instead recommends new modifications to SQI No. 5, plus a completely new customer service standard (abandoned calls) with associated new penalties. Specifically, Public Counsel recommends the Commission (1) modify SQI No. 5 to require PSE to answer 80 percent of calls within 30 seconds, (2) establish a new customer call standard to require PSE to meet an annual call abandonment rate not to exceed five percent, and (3) apply a penalty structure to her proposed call abandonment standard. In addition, Ms. Alexander renews her proposals that have been proposed and rejected in past PSE proceedings—specifically, to impose monthly or quarterly average call answering standards. Ms. Alexander also proposes several modifications to PSE’s electric 24-hour and 120-hour service guarantees. PSE proposed no changes to this tariff schedule in its initial filing, and PSE witness Catherine Koch respond to the proposed modifications in her prefiled rebuttal testimony, Exh. CAK-4T.

Q. Why did Ms. Alexander propose these new modifications?

A. With regard to the customer access center proposals, Ms. Alexander claims that her recommendations are based on “PSE’s failure to improve its call center performance.” As described below, Ms. Alexander bases her opinion on incorrect assertions and misinterpretations, and the Commission should reject her recommendations.

# II. PSE’S SQI NO. 5 PERFORMANCE AND ITS PROPOSED MODIFICATION TO SQI NO. 5

Q. How do you describe PSE’s SQI No. 5 performance since the standard’s inception?

A. PSE’s SQI No. 5 performance has been strong over the last twenty years, contrary to Ms. Alexander’s claims. Ms. Alexander claims, that PSE has failed to meet the SQI No. 5 performance standard “in several years”.[[1]](#footnote-1) I do not agree with this assertion. When asked for support for her claim, Ms. Alexander pointed to Table 2 of her testimony, which lists two instances in the last twenty years when PSE did not meet the SQI No. 5 index performance requirement, once in 1997 and once in 2015. She explained in a data request response that “more than one occasion since 1997” means several years. See Exh. GJZ-4.

Q. Why did PSE miss the SQI No. 5 performance benchmark in 1997?

A. Following the merger of Washington Natural Gas Company and Puget Sound Power and Light Company in 1997, PSE faced unusual and extreme call center pressures. The volume of calls increased as customers responded to the post-merger revised bill format. At the same time, the call center lost a significant number of experienced call center personnel during the consolidation of the call center into a single Bellevue location. PSE responded by immediately undertaking a hiring program, but the pool of available qualified call center personnel was limited. PSE’s efforts to hire and train call center staff eventually paid off – the percentage of calls answered within 30 seconds rose to more than 75 percent by the end of the reporting period.

Q. Why did PSE miss the SQI No. 5 performance benchmark in 2015?

A. The following are the four main components that contributed to PSE’s failure to meet SQI No. 5 in 2015:

* + - 1. a change in collection and disconnect procedure, which led to higher than expected calls and lengthier call times;
      2. unseasonal outages and storm activity, which drove customers to call PSE and experience longer-than-usual wait times during August’s widespread power outages;
      3. hiring and training new representatives to be able to handle the more complex calls associated with credit and disconnections, and
      4. unanticipated failures of PSE’s technology systems that support online and self-serve outage reporting and information tools.

Q. Has PSE ever missed SQI No. 5 and not been penalized?

A. Yes, PSE did not meet its SQI No. 5 benchmark in 2013 due to PSE’s new CIS implementation. The Commission found that PSE had experienced “unusual or exceptional circumstances for which PSE’s level of preparedness and response was reasonable,” and the Commission granted PSE full mitigation of the automatically imposed penalty that year.[[2]](#footnote-2)

Q. Please explain why PSE is proposing changes to the SQI No. 5 measurement to include IVR transactions in the calculations of SQI No. 5 performance now.

A. The SQI No. 5 measurement should be modified to include both IVR transactions and transactions handled by a live agent because both types of transactions are originated by a customer phone call to PSE for the purpose of addressing a customer need. There is a substantial and increasing volume of calls managed through the IVR. By not including IVR transactions in today’s SQI No. 5 calculations, a significant number of customer telephone interactions are omitted from any performance measure. Consequently, SQI No. 5 is no longer a comprehensive measurement of customer and PSE telephone interactions. As the customer interaction experience with PSE changes and more of the newer self-service communication channels are introduced, the performance measurement for PSE’s Customer Care Center needs to be modified to incorporate the IVR self-service transactions in addition to phone calls handled by an agent in PSE’s Customer Care Center.

Q. Have customers increased the number of successful transactions in the IVR resulting in a reduction of calls to the call center?

A. Yes. Customers are clearly using IVR more and the call center less, as shown in the figure below.

Figure 1 - Total Successful IVR and Agent Handled Phone Calls  
During 1/1/2013-9/30/2016



It should be noted that customers can complete IVR transactions on a 24 hour basis, unlike call center calls, which must be made during business hours.

Q. How do you respond to Staff witness Andrew Roberts when he states that PSE should not include IVR transactions in the SQI No. 5 calculations because one phone call handled through the IVR system could result in multiple IVR self-service success transactions?[[3]](#footnote-3)

A. Mr. Roberts’s observation underscores why IVR should be included in SQI No. 5, rather than excluded. The IVR self-serve channels allow customers to interact with PSE in a more efficient manner, 24 hours a day, and reflect PSE’s recognition of the evolved customer self-serve needs. Each transaction completed through IVR is initiated by a customer call, and each completed transaction is a customer request that was satisfied. These are appropriate measurements to track in SQI No. 5.

Q. Do you agree with Mr. Roberts’s assertion that there will be a significant deterioration of customer service if SQI No. 5 is modified?

A. No, I do not agree because PSE is not proposing any modifications in the way it engages with the customer. Rather, the modification to SQI No. 5 will merely change the calculations to more accurately reflect evolving customer experiences. According to Staff’s customer complaint data, since 2012 there have been only 15 complaints related to the call center phone answering speed performance, and eight of those were during the stabilization of the new CIS launched in April 2013. There were no complaints related to Call Center response time in 2016 and year-to-date 2017. In fact, PSE plans significant improvements to its IVR capabilities, which I believe will increase customer satisfaction even further.

Q. Please explain PSE’s objectives for IVR improvements.

A. The objectives of the IVR improvements to date have included an easy menu for customers to choose from when they call for help. The design principles include minimizing complexity, making the IVR available 24 hours a day and, where possible, providing a self-service option for high volume transactions such as account balance check, outage report or make a payment. The current IVR was not designed to handle every situation, and the customer is automatically transferred to an agent after two failed attempts.

# III. PSE’S RESPONSE TO PUBLIC COUNSEL’S RECOMMENDATIONS FOR ADDITIONAL CUSTOMER PERFORMANCE BENCHMARKS

Q. Please describe Public Counsel’s additional recommendations to PSE’s customer service standards.

A. Public Counsel recommends other modifications to SQI No. 5 and additional customer service benchmarks. Ms. Alexander recommends that the Commission 1) modify SQI No. 5 to require PSE answer 80 percent of calls within 30 seconds, and 2) initiate a new call abandonment standard not to exceed five percent, with penalties for noncompliance. I respond to Ms. Alexander’s first recommendation in more detail below. Regarding Ms. Alexander’s recommendation to initiate a call abandonment standard, the Commission should reject such a proposal because it is based on Ms. Alexander’s misinterpretation of PSE’s SQI No. 5 data.

Q. Please elaborate.

A. Ms. Alexander states that “[u]nder the current methodology for calculating call-answering performance, calls abandoned after 30 seconds are eliminated from the calculation.” Ms. Alexander is misreading the SQI No. 5 calculation because calls abandoned after 30 seconds *are* included in the SQI No. 5 performance measurement.

The annual performance is determined by dividing the average of the 12 monthly call answering performance percentages. The calculation of the monthly answering performance is demonstrated through the following formula:

|  |  |
| --- | --- |
| *Monthly call answering performance =* | *aggregate number of calls answered by a company rep within 30 seconds* |
| *aggregate number of calls received*  *(includes abandoned calls greater than 30 seconds)* |

PSE is currently required to achieve an annual benchmark of 75 percent of the calls answered within 30 seconds based upon the average of the twelve monthly call performance results.

Q. How does PSE measure abandoned calls?

A. Calls abandoned after 30 seconds are included in the denominator aggregate number of calls received. As stated in PSE’s Response to Public Counsel Data Request No. 22 (Exh. BRA-3), abandoned calls *less* than 30 seconds are excluded from the SQI No. 5 monthly call answering performance calculation.

Q. How does Ms. Alexander support her claim that PSE excludes calls abandoned after 30 seconds from SQI No. 5?

A. PSE asked that very question in PSE’s Data Request to Public Counsel No. 9. In response, Ms. Alexander states, “PSE’s Response to Public Counsel Data Request No. 22, Attachment A, is responsive to this request. Specifically, DR No. 22 states: ‘Excluding customer calls abandoned within 30 seconds of waiting for an operator. The change was agreed to by Staff and Public Counsel via their e-mails to PSE on April 1, 2010.’” See Exh. GJZ-5 for a copy of Public Counsel’s Response to PSE Data Request No. 9. Ms. Alexander apparently misinterprets “within 30 seconds” to mean “after 30 seconds”. Ms. Alexander is incorrect in her claim that PSE excludes calls abandoned after 30 seconds from SQI No. 5. Ms. Alexander’s misinterpretation is particularly troubling because she relies on this misinterpretation to recommend that the Commission implement an entirely new customer service standard for abandoned calls and to impose penalties. The Commission should reject Ms. Alexander’s recommendation.

### A. The Commission Should Reject Public Counsel’s Proposal to Require 80 Percent of Calls to be Answered in 30 Seconds

Q. Do you agree with Ms. Alexander’s recommendation to revise the SQI No. 5 performance benchmark to 80 percent of calls answered in 30 seconds?

A. No. Ms. Alexander claims, “I have always recommended a minimum performance standard of answering at least 80 percent of calls within 30 seconds on an annual average.” Yet a simple review of Ms. Alexander’s past testimony before this Commission reveals that she has repeatedly recommended a standard of 75 percent of calls within 30 seconds for PSE. In PSE’s 2007 general rate case, Ms. Alexander recommended PSE meet a standard of 75 percent of calls answered within 30 seconds.[[4]](#footnote-4) A few weeks later, in PSE’s 2007 merger proceeding, Docket U-072375, Ms. Alexander again recommended PSE meet a standard of 75 percent of calls answered within 30 seconds.[[5]](#footnote-5) Contrary to her claim that she always recommends a standard of 80 percent, Ms. Alexander has repeatedly testified that 75 percent of calls answered within 30 seconds is the appropriate standard for PSE.

Ms. Alexander’s new recommendation in this proceeding for an 80 percent standard should be rejected not only because it contradicts her prior recommendations for PSE, but because her recommendation is based upon an incorrect interpretation of the PSE customer service performance as measured by SQI Nos. 2, 5, and 6.

Q. Why do you say that Ms. Alexander’s recommendation is based on an incorrect interpretation of PSE’s customer service performance?

A. The Commission should reject Ms. Alexander’s recommendation because it is based on her unsubstantiated claim that PSE is underperforming with regard to customer satisfaction. For instance, on page 13, lines 15-17 of Exh. BRA-1T, Ms. Alexander claims that staffing cuts and budget reductions resulted in PSE underperforming in 2013–2017. Ms. Alexander is incorrect with regard to staffing and budget levels, and PSE has not underperformed. Figure 2, below provides a side by side comparison of budget and actual operating costs for years 2013 through 2016.

**Figure 2 –Customer Care Center Staffing, Budget and Actual Costs**



In early 2013, PSE hired and trained additional customer service staff, including outside contractors, in anticipation of high call volumes and high transaction times that would result from the deployment of the new CIS system on April 1, 2013. This increase was based on data from comparable CIS launches for other utilities prior to 2012, which indicated that it could take up to three years to return to normal customer service levels post go-live. PSE did experience high call volumes and underperformance of the SQI No. 5 for two quarters following the new CIS launch; however, PSE was able to restore service level to normal in the fourth quarter of 2013. The following year, 2014, PSE met the SQI No. 5 performance. Beginning in late 2015, as the system began to stabilize and the additional staff was no longer a justifiable expense, PSE returned the staffing numbers and budgets back to a normal transactional level. In 2016, PSE met SQI No. 5.

On page 13, lines 10-12, of Ms. Alexander’s testimony, she references the call center staff data for 2015 through 2017, isolating two years and taking two data points out of context. She then misstates the budget data, “The budget for the call center has also decreased annually since 2013, with a significant decrease 2017.” As illustrated above and by her own exhibit, Exh. BRA-7, PSE increased the call center budget in 2014 over 2013 in order to increase support for the CIS post-launch stabilization. Then, as explained above, both budgets and staff were gradually returned to normal, pre-CIS levels. As summarized above, PSE responded to the operating demands of 2015 by adding $3.2 million (20 percent) to PSE’s initial 2015 budget. In 2016 the staffing numbers, budget, and actual operating cost results are in line with expected results, noting a minimal variance between budget and actual operating costs.

The exhibits relied on by Ms. Alexander in her attempt to demonstrate customer service underperformance by PSE reveals instead that PSE has consistently met its customer service performance measurements. Over the period between 2013 through 2017, the period Ms. Alexander examined, WUTC customer complaints have decreased, customer call performance has increased, and perhaps the most revealing performance standard–customer satisfaction–has been well above the benchmark. Below are figures illustrating PSE’s performance in these customer service performance measurements.

Figure 3 - 1997-2016 SQI No. 2

Figure 4 - 1997-2016 SQI No. 5

Figure 5 - 1997-2016 SQI No. 6

Q. How do you respond to Ms. Alexander’s claim that PSE’s monthly call center performance is erratic?[[6]](#footnote-6)

A. PSE’s call center monthly performance is affected by both internal factors such as staff levels (e.g., unexpected staff absences), and external factors that are beyond PSE’s control. Natural gas and electric emergencies can happen any hour of any day and are largely unpredictable when not associated with forecasted weather activity. Equipment failures and third party damages that drive these emergencies can create a high influx of emergency calls, which go to the front of the call queue displacing other calls until the emergency calls have subsided. Depending upon the time of day and the duration, just one hour of high emergency call volumes can produce a backlog of hundreds of calls, which can make call center service level unattainable for the day. Call center technology issues can also impact PSE’s ability to answer calls. For major weather events or other predictable events, PSE prepares in advance by altering PSE employee work schedules and ramping up its overflow call center resource as needed. High bill and disconnection calls peak seasonally, and PSE’s workforce management team has the ability to allocate resources to meet these seasonal billing related calls. Each year, in November, March, and June (periods when PSE is reconciling the account balance with the customers on the budget pay program), PSE experiences an influx of calls regarding the change to customers’ monthly budget pay amount. Occurrence of an unplanned outage on top of these billing calls can greatly exacerbate the call backlog and lead to a perception that call center performance is “erratic”.

Q. Describe the business changes that would result if the Commission were to change the benchmark for SQI No. 5 to 80 percent of calls answered within 30 seconds.

A. In order to meet the change proposed by Public Counsel, PSE estimates it would need to add an additional 32 full time employees, which would add an estimated cost of $2.4 million to the call center operating costs.

Q. How do you respond to Ms. Alexander’s claim that PSE’s service quality index has changed frequently and there is a clear pattern of PSE seeking to change a performance standard when it has failed to meet the required annual performance level?[[7]](#footnote-7)

A. PSE objects to this claim. There is no evidence to substantiate Ms. Alexander’s claim that PSE has sought to change SQI Nos. 2, 5 or 6 performance standard when it has failed to meet the required annual performance level.

Q. Has PSE requested any change to SQI No. 5 after a failure to meet the 75 percent benchmark?

A. No, PSE has not requested any change to SQI No. 5 measurement because it did not meet the benchmark. The following figure summarizes the Service Quality Program changes pertaining to SQI Nos. 2, 5, and 6. The change associated with SQI No. 2 obligates PSE to meet a higher service quality standard. The SQI No. 5 calculation change regarding the exclusion of abandoned calls within 30 seconds results in a more accurate performance measurement although the impact of this change is minimal. Neither of these changes were requested or made because PSE failed to meet the applicable benchmark.

**Figure 6 - Service Quality Program Changes to SQI Nos. 2, 5, and 6**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **BRA-1T, Line No.** | **No.** | **Service Quality Index (SQI)** | **Initial Benchmark at the Time of First Service Quality Program Reporting per UE-951270 and UG-960195 Fourteenth Supplemental Order** | | **Revision Effective Date** | **Revision** |
| 3 | 2 | WUTC Complaint Ratio | 0.50 | complaints per 1000 customers | 10/8/2008 | SQI No. 2 benchmark was revised to 0.40 per Order 12 of consolidated Docket Nos. UE-072300 and UG-072301, Appendix D, section L |
| 16 | 5 | Telephone Center Answering Performance | 75% | of calls answered live by company rep within 30 seconds of request to speak to live operator | 4/1/2010 | Excluding customer calls abandoned within 30 seconds of waiting for an operator. The change was agreed to by WUTC staff and Public Counsel via their e-mails to PSE on April 1, 2010. |
| 17 | 6 | Telephone Center Transactions Customer Satisfaction | 91% | rating of 5 or higher on 7 point scale | 6/20/2002 | Benchmark 90% satisfied (rating of 5 or higher on a 7-point scale) per consolidated Docket Nos. UE-011570 and UG-011571, Twelfth Supplemental Order, Exhibit J, page 3, section B |

### B. The Commission Should Reject Public Counsel’s Proposal to Initiate a New Standard for Abandoned Calls

Q. Do you agree with Ms. Alexander’s recommendation to add an SQI for abandoned calls?

A. No. Ms. Alexander recommends the Commission establish a new SQI that would require PSE to maintain abandoned calls at less than five percent. Her recommendation is based upon a flawed assumption that calls over 30 seconds are not included in the SQI No. 5 measure, when in fact they are included. Further, calls abandoned within 30 seconds were initially measured, but have since been exempted from measurement because PSE does not have the chance to answer this type of call within 30 seconds and has no control over the reasons that customers decide to abandon a call. Therefore, the Commission has already determined that abandoned calls of more than 30 seconds should be measured (and are measured), and abandoned calls of less than 30 seconds should not be measured.[[8]](#footnote-8) Ms. Alexander’s recommendation for another standard for abandoned calls is unnecessary and highlights her misinterpretation of the SQIs as they currently exist.

**Q. How do you respond to Ms. Alexander’s proposals regarding PSE’s electric service guarantee and its electric cost recovery mechanism (“ECRM”)?**

A. Please refer to the Prefiled Rebuttal Testimony of Catherine A. Koch, Exh. CAK-4T, for a response to Ms. Alexander’s response testimony regarding PSE’s electric service guarantee and ECRM.

# IV. CONCLUSION

Q. Please summarize the reasons why the Commission should implement PSE’s proposed modifications to SQI No. 5 and reject the recommendations proposed by Public Counsel.

A. The Commission should reject Public Counsel’s proposed recommendations because they are based on an incorrect interpretation of SQI No. 5 data and on a mischaracterization of PSE’s overall customer performance.

The Commission should implement PSE’s proposed modification to SQI No. 5 to include IVR transactions because such modification recognizes the work PSE has made to improve the overall customer experience for customers wishing to use self-serve channels to conduct certain business transactions with PSE. As more customers use the evolving communication self-serve channels and capabilities, PSE expects that, over time, higher numbers of more complex calls will be offered to call takers as high volume, short duration calls are transacted in the IVR, web and mobile spaces. Therefore, PSE’s proposed modifications allow the standard to “catch up” with technology and more accurately reflect the work performed when a customer makes a call to PSE.

Q. Does this conclude your rebuttal testimony?

A. Yes.

1. Alexander, Exh. BRA-1T at 4:14-15. [↑](#footnote-ref-1)
2. Dockets UE-072300/UG-072301, Order 24, Final Order granting Petition for Mitigation at ¶ 3 and ¶ 9(April 29, 2014). [↑](#footnote-ref-2)
3. Roberts, Exh. AR-1T at 3:17-21. [↑](#footnote-ref-3)
4. Dockets UE-072300/UG-072301, Alexander, Exh. BRA-1T at 32:17-18. [↑](#footnote-ref-4)
5. Docket U-072375, Alexander, Exh. BRA-1T at 30: 8-9. [↑](#footnote-ref-5)
6. Alexander, Exh. BRA-1T at 4:15-16. [↑](#footnote-ref-6)
7. Alexander, Exh. BRA-1T at 4:11-13. [↑](#footnote-ref-7)
8. *See* Dockets UE-072300/UG-072301, Compliance Filing Redline App. 2 (Dec. 27, 2010) and Commission’s Compliance Letter (Jan. 5, 2011). [↑](#footnote-ref-8)