

**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**

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1 **PUGET SOUND ENERGY**

2 **PREFILED REBUTTAL TESTIMONY**  
3 **(NONCONFIDENTIAL) OF**  
4 **GREG J. ZELLER**  
5

6 **I. INTRODUCTION**

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

10 A. Yes, I submitted the direct testimony and supporting exhibits referenced as GJZ-  
11 1T and GJZ-2.

12 **Q. What is the purpose of your rebuttal testimony?**

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

19 **Q. Please summarize your rebuttal testimony.**

20 A. Delivering the highest quality of customer experience to all customers has always  
21 been PSE’s focus. Providing additional self-service capabilities through a variety  
22 of channels that align with customer preferences helps PSE achieve its target of

1 meeting customers' expanding communication needs. Since the launch of its new  
2 customer information system ("CIS") technology platform in 2013, PSE has been  
3 working to enable additional customer preference channel transactional  
4 capabilities.

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

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

1 **Q. Please summarize other parties' responses to the service quality standard**  
2 **modifications PSE has proposed in this proceeding.**

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

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

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

7 **II. PSE’S SQI NO. 5 PERFORMANCE AND ITS PROPOSED**  
8 **MODIFICATION TO SQI NO. 5**

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

11 A. PSE’s SQI No. 5 performance has been strong over the last twenty years, contrary  
12 to Ms. Alexander’s claims. Ms. Alexander claims, that PSE has failed to meet the  
13 SQI No. 5 performance standard “in several years”.<sup>1</sup> I do not agree with this  
14 assertion. When asked for support for her claim, Ms. Alexander pointed to Table  
15 2 of her testimony, which lists two instances in the last twenty years when PSE  
16 did not meet the SQI No. 5 index performance requirement, once in 1997 and  
17 once in 2015. She explained in a data request response that “more than one  
18 occasion since 1997” means several years. See Exh. GJZ-4.

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<sup>1</sup> Alexander, Exh. BRA-1T at 4:14-15.

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

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

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

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

- 15 1. a change in collection and disconnect procedure, which led to higher than  
16 expected calls and lengthier call times;
- 17 2. unseasonal outages and storm activity, which drove customers to call PSE and  
18 experience longer-than-usual wait times during August's widespread power  
19 outages;
- 20 3. hiring and training new representatives to be able to handle the more complex  
21 calls associated with credit and disconnections, and



1 4. unanticipated failures of PSE’s technology systems that support online and  
2 self-serve outage reporting and information tools.

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

4 A. Yes, PSE did not meet its SQI No. 5 benchmark in 2013 due to PSE’s new CIS  
5 implementation. The Commission found that PSE had experienced “unusual or  
6 exceptional circumstances for which PSE’s level of preparedness and response  
7 was reasonable,” and the Commission granted PSE full mitigation of the  
8 automatically imposed penalty that year.<sup>2</sup>

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

12 A. The SQI No. 5 measurement should be modified to include both IVR transactions  
13 and transactions handled by a live agent because both types of transactions are  
14 originated by a customer phone call to PSE for the purpose of addressing a  
15 customer need. There is a substantial and increasing volume of calls managed  
16 through the IVR. By not including IVR transactions in today’s SQI No. 5  
17 calculations, a significant number of customer telephone interactions are omitted  
18 from any performance measure. Consequently, SQI No. 5 is no longer a  
19 comprehensive measurement of customer and PSE telephone interactions. As the  
20 customer interaction experience with PSE changes and more of the newer self-

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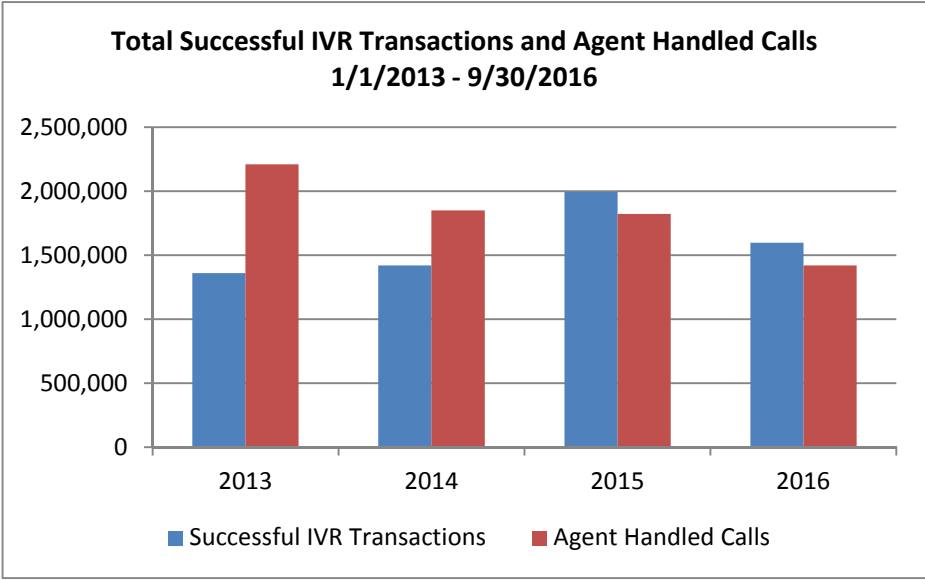
<sup>2</sup> Dockets UE-072300/UG-072301, Order 24, Final Order granting Petition for Mitigation at ¶ 3 and ¶ 9(April 29, 2014).

1 service communication channels are introduced, the performance measurement  
2 for PSE's Customer Care Center needs to be modified to incorporate the IVR self-  
3 service transactions in addition to phone calls handled by an agent in PSE's  
4 Customer Care Center.

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

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

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



11 It should be noted that customers can complete IVR transactions on a 24 hour  
12 basis, unlike call center calls, which must be made during business hours.  
13

1 **Q. How do you respond to Staff witness Andrew Roberts when he states that**  
2 **PSE should not include IVR transactions in the SQI No. 5 calculations**  
3 **because one phone call handled through the IVR system could result in**  
4 **multiple IVR self-service success transactions?<sup>3</sup>**

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

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

14 A. No, I do not agree because PSE is not proposing any modifications in the way it  
15 engages with the customer. Rather, the modification to SQI No. 5 will merely  
16 change the calculations to more accurately reflect evolving customer experiences.  
17 According to Staff's customer complaint data, since 2012 there have been only 15  
18 complaints related to the call center phone answering speed performance, and  
19 eight of those were during the stabilization of the new CIS launched in April  
20 2013. There were no complaints related to Call Center response time in 2016 and

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<sup>3</sup> Roberts, Exh. AR-1T at 3:17-21.

1 year-to-date 2017. In fact, PSE plans significant improvements to its IVR  
2 capabilities, which I believe will increase customer satisfaction even further.

3 **Q. Please explain PSE's objectives for IVR improvements.**

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

11 **III. PSE'S RESPONSE TO PUBLIC COUNSEL'S**  
12 **RECOMMENDATIONS FOR ADDITIONAL CUSTOMER**  
13 **PERFORMANCE BENCHMARKS**

14 **Q. Please describe Public Counsel's additional recommendations to PSE's**  
15 **customer service standards.**

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

1 **Q. Please elaborate.**

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

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

$$\text{Monthly call answering performance} = \frac{\text{aggregate number of calls answered by a company rep within 30 seconds}}{\text{aggregate number of calls received (includes abandoned calls greater than 30 seconds)}}$$

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

13 **Q. How does PSE measure abandoned calls?**

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

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

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

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

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

20 A. No. Ms. Alexander claims, “I have always recommended a minimum  
21 performance standard of answering at least 80 percent of calls within 30 seconds  
22 on an annual average.” Yet a simple review of Ms. Alexander’s past testimony  
23 before this Commission reveals that she has repeatedly recommended a standard

1 of 75 percent of calls within 30 seconds for PSE. In PSE's 2007 general rate case,  
2 Ms. Alexander recommended PSE meet a standard of 75 percent of calls  
3 answered within 30 seconds.<sup>4</sup> A few weeks later, in PSE's 2007 merger  
4 proceeding, Docket U-072375, Ms. Alexander again recommended PSE meet a  
5 standard of 75 percent of calls answered within 30 seconds.<sup>5</sup> Contrary to her claim  
6 that she always recommends a standard of 80 percent, Ms. Alexander has  
7 repeatedly testified that 75 percent of calls answered within 30 seconds is the  
8 appropriate standard for PSE.

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

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

16 A. The Commission should reject Ms. Alexander's recommendation because it is  
17 based on her unsubstantiated claim that PSE is underperforming with regard to  
18 customer satisfaction. For instance, on page 13, lines 15-17 of Exh. BRA-1T, Ms.  
19 Alexander claims that staffing cuts and budget reductions resulted in PSE  
20 underperforming in 2013–2017. Ms. Alexander is incorrect with regard to staffing

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<sup>4</sup> Dockets UE-072300/UG-072301, Alexander, Exh. BRA-1T at 32:17-18.

<sup>5</sup> Docket U-072375, Alexander, Exh. BRA-1T at 30: 8-9.

1 and budget levels, and PSE has not underperformed. Figure 2, below provides a  
2 side by side comparison of budget and actual operating costs for years 2013  
3 through 2016.

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

Year	Customer Care Center Staffing	Overflow Staffing	Budget	Actual Operating Cost	Annual Variance (Bud-Actual)
2013	246.5	115	\$16,715,731	\$18,603,928	(\$1,888,197)
2014	192	50	\$17,018,880	\$16,473,338	\$545,542
2015	253.5	50	\$16,035,466	\$19,239,639	(\$3,204,173)
2016	223	30	\$15,883,663	\$15,705,518	\$178,145
2017	185	30	\$13,323,814	\$2,385,453	\$10,938,361

5  
6 In early 2013, PSE hired and trained additional customer service staff, including  
7 outside contractors, in anticipation of high call volumes and high transaction  
8 times that would result from the deployment of the new CIS system on April 1,  
9 2013. This increase was based on data from comparable CIS launches for other  
10 utilities prior to 2012, which indicated that it could take up to three years to return  
11 to normal customer service levels post go-live. PSE did experience high call  
12 volumes and underperformance of the SQI No. 5 for two quarters following the  
13 new CIS launch; however, PSE was able to restore service level to normal in the  
14 fourth quarter of 2013. The following year, 2014, PSE met the SQI No. 5  
15 performance. Beginning in late 2015, as the system began to stabilize and the  
16 additional staff was no longer a justifiable expense, PSE returned the staffing  
17 numbers and budgets back to a normal transactional level. In 2016, PSE met  
18 SQI No. 5.

19 On page 13, lines 10-12, of Ms. Alexander’s testimony, she references the call  
20 center staff data for 2015 through 2017, isolating two years and taking two data

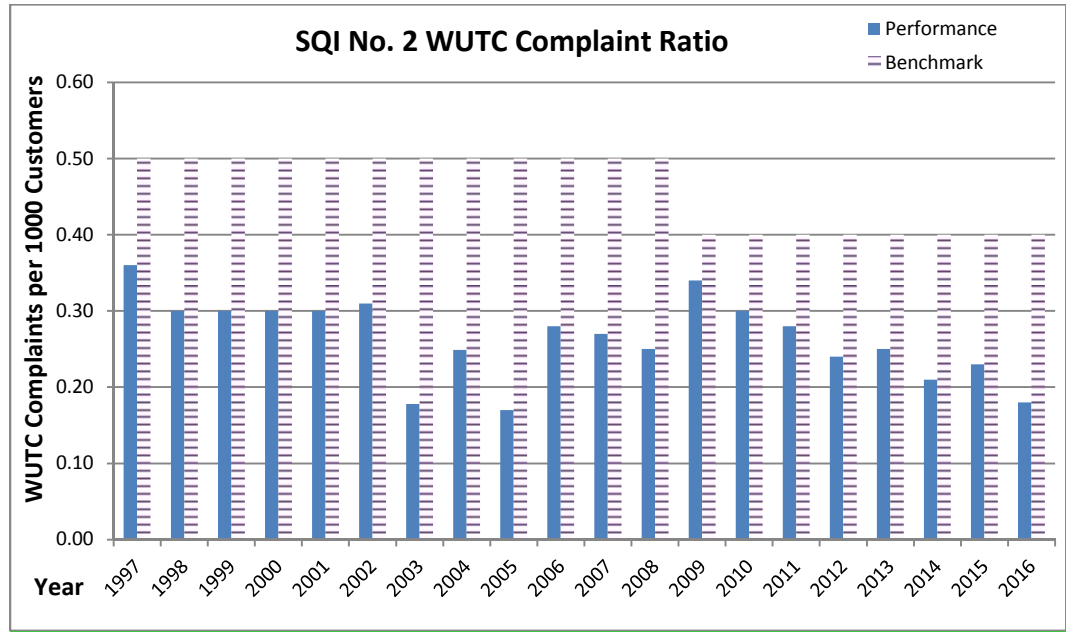


1 points out of context. She then misstates the budget data, “The budget for the call  
2 center has also decreased annually since 2013, with a significant decrease 2017.”  
3 As illustrated above and by her own exhibit, Exh. BRA-7, PSE increased the call  
4 center budget in 2014 over 2013 in order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

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

1

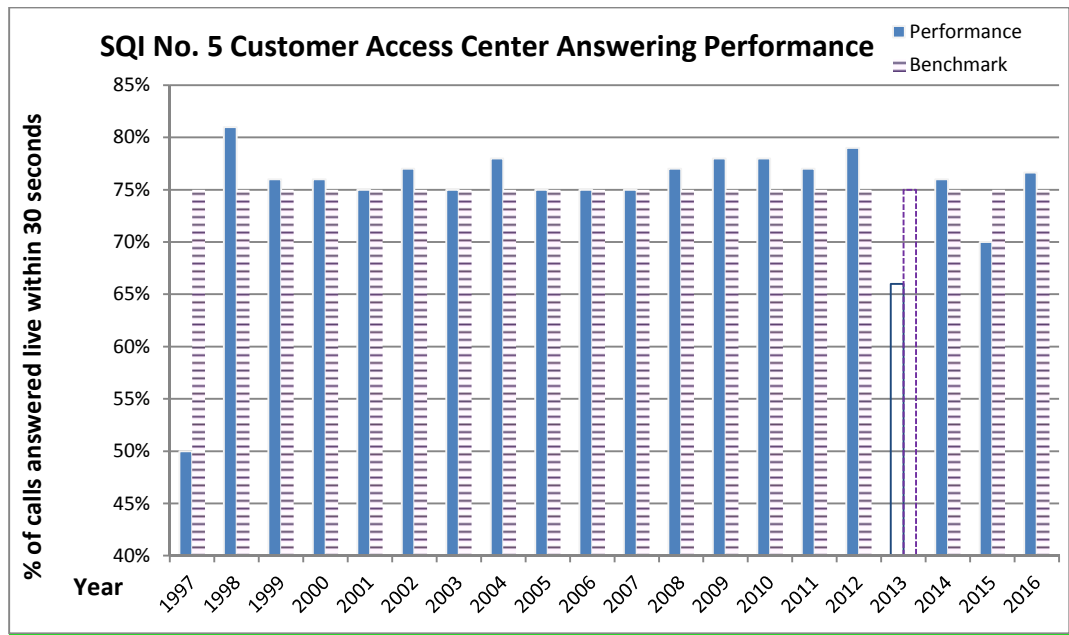
Figure 3 - 1997-2016 SQI No. 2



2

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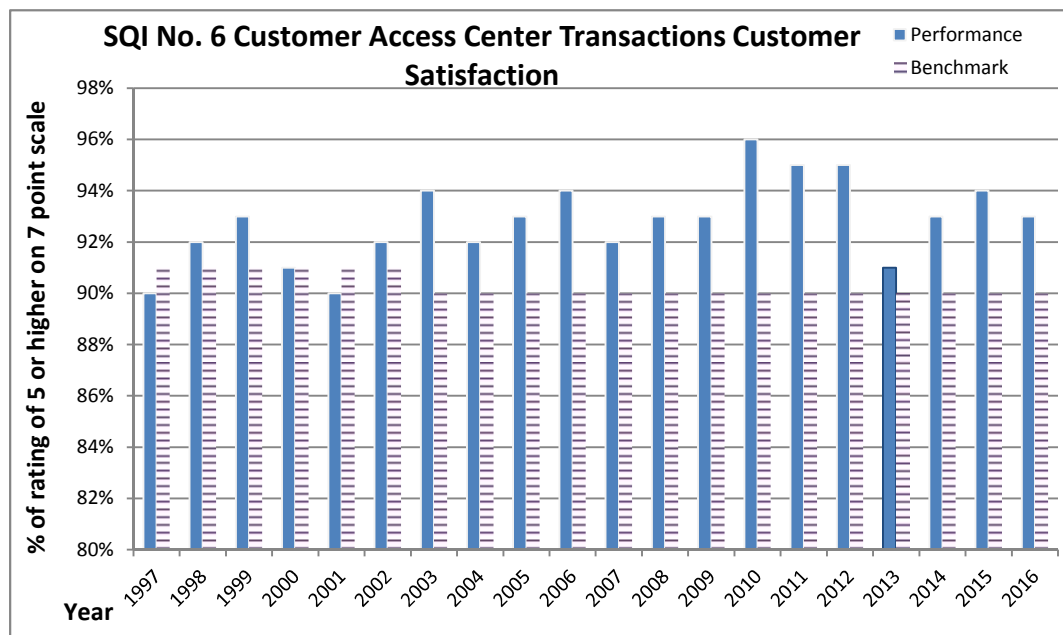
Figure 4 - 1997-2016 SQI No. 5



4

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?<sup>6</sup>

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

<sup>6</sup> Alexander, Exh. BRA-1T at 4:15-16.

1 level unattainable for the day. Call center technology issues can also impact  
2 PSE's ability to answer calls. For major weather events or other predictable  
3 events, PSE prepares in advance by altering PSE employee work schedules and  
4 ramping up its overflow call center resource as needed. High bill and  
5 disconnection calls peak seasonally, and PSE's workforce management team has  
6 the ability to allocate resources to meet these seasonal billing related calls. Each  
7 year, in November, March, and June (periods when PSE is reconciling the  
8 account balance with the customers on the budget pay program), PSE experiences  
9 an influx of calls regarding the change to customers' monthly budget pay amount.  
10 Occurrence of an unplanned outage on top of these billing calls can greatly  
11 exacerbate the call backlog and lead to a perception that call center performance  
12 is "erratic".

13 **Q. Describe the business changes that would result if the Commission were to**  
14 **change the benchmark for SQI No. 5 to 80 percent of calls answered within**  
15 **30 seconds.**

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

1 **Q. How do you respond to Ms. Alexander's claim that PSE's service quality**  
2 **index has changed frequently and there is a clear pattern of PSE seeking to**  
3 **change a performance standard when it has failed to meet the required**  
4 **annual performance level?**<sup>7</sup>

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

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

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

18

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<sup>7</sup> Alexander, Exh. BRA-1T at 4:11-13.

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

BRA-IT, 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

2  
3 **B. The Commission Should Reject Public Counsel’s Proposal to**  
4 **Initiate a New Standard for Abandoned Calls**

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

7 A. No. Ms. Alexander recommends the Commission establish a new SQI that would  
8 require PSE to maintain abandoned calls at less than five percent. Her  
9 recommendation is based upon a flawed assumption that calls over 30 seconds are  
10 not included in the SQI No. 5 measure, when in fact they are included. Further,  
11 calls abandoned within 30 seconds were initially measured, but have since been  
12 exempted from measurement because PSE does not have the chance to answer  
13 this type of call within 30 seconds and has no control over the reasons that  
14 customers decide to abandon a call. Therefore, the Commission has already

1 determined that abandoned calls of more than 30 seconds should be measured  
2 (and are measured), and abandoned calls of less than 30 seconds should not be  
3 measured.<sup>8</sup> Ms. Alexander's recommendation for another standard for abandoned  
4 calls is unnecessary and highlights her misinterpretation of the SQIs as they  
5 currently exist.

6 **Q. How do you respond to Ms. Alexander's proposals regarding PSE's electric**  
7 **service guarantee and its electric cost recovery mechanism ("ECRM")?**

8 A. Please refer to the Prefiled Rebuttal Testimony of Catherine A. Koch, Exh. CAK-  
9 4T, for a response to Ms. Alexander's response testimony regarding PSE's  
10 electric service guarantee and ECRM.

#### 11 IV. CONCLUSION

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

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

18 The Commission should implement PSE's proposed modification to SQI No. 5 to  
19 include IVR transactions because such modification recognizes the work PSE has

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<sup>8</sup> See Dockets UE-072300/UG-072301, Compliance Filing Redline App. 2 (Dec. 27, 2010) and Commission's Compliance Letter (Jan. 5, 2011).

1 made to improve the overall customer experience for customers wishing to use  
2 self-serve channels to conduct certain business transactions with PSE. As more  
3 customers use the evolving communication self-serve channels and capabilities,  
4 PSE expects that, over time, higher numbers of more complex calls will be  
5 offered to call takers as high volume, short duration calls are transacted in the  
6 IVR, web and mobile spaces. Therefore, PSE's proposed modifications allow the  
7 standard to "catch up" with technology and more accurately reflect the work  
8 performed when a customer makes a call to PSE.

9 **Q. Does this conclude your rebuttal testimony?**

10 A. Yes.