Date Filed: October 19, 2026

Witness: Jared A. Lawrence and Shamus O'Brien
Request from: Office of Consumer Counsel

Question:

(COMPLAINT DEFINITION) Please refer to the Response to EOE-95. Is the Company stating that a "complaint" must come from a government entity or government individual and that a complaint cannot come directly from a customer to the Company? If yes, is every customer contact with the Company considered an "inquiry"? If no, please explain and indicate all ways in which the Company may receive a customer complaint.

Response:

The Company is not stating that a complaint must come from a governmental entity or governmental individual, nor is it stating that complaints cannot come directly from customers. As described in Response to OCC-136[i], the Company receives customer complaints and concerns directly through its Contact Centers and other customer service channels. These matters are generally managed through the Company's customer-inquiry escalation process, which is designed to investigate and resolve customer concerns regardless of whether they are characterized as an inquiry, concern, or informal complaint.

The Company's reference in EOE-095[ii], to complaints from channels such as the Public Utilities Regulatory Authority ("PURA"), the Attorney General, elected officials, Government Affairs, or escalations to leadership was intended to describe the Company's definition of a formal complaint for purposes of that response. Formal complaints are one subset of customer complaints and concerns that come to the Company's attention through specific escalation channels.

The Company does not consider every customer contact to be a complaint. Customers contact the Company for a variety of reasons, including routine service requests, account inquiries, billing questions, payment arrangements, outage information, and other informational purposes. When a customer expresses dissatisfaction, requests additional review, or raises a concern requiring further investigation or escalation, the matter may be addressed through the Company's customer escalation process. The Company does not generally distinguish between whether such escalations are characterized as inquiries or informal complaints and seeks to investigate and resolve them through the same process.

Prior Referenced Responses:

[i] OCC-136 Question:

(COMPLAINTS) In the test year, how many and what percentage of customer complaints were resolved in one call/contact?

OCC-136 Response:

The Company periodically receives complaints directly from customers through its Contact Centers. The Company addresses such complaints through its structured customer-inquiry escalation process. As a practice, the Company tracks all customer inquiries that are escalated after the initial contact with a Customer Service Representative ("CSR"), regardless of whether they are deemed to be an actionable complaint. These escalations are logged by CSRs through an internal escalation tracking mechanism that captures any customer concerns regarding specific processes, service experiences, or perceived gaps in resolution. Customer-inquiry escalation data is collected at the time of interaction, where the aim is to resolve the customer's inquiry on the first call.

The focus of an escalation ticket is to follow up and resolve the call. The Company does not distinguish between whether the customer is making an inquiry or an informal complaint. All customer inquiries are escalated with urgency, with no topic given higher priority, regardless of whether the complaint is a live transfer or call back. The Company targets a 24-hour response time to complete these escalations. However, it is important to note that not all escalations can be resolved on the first contact as they may require further research/follow up. The details captured in the escalation process feed into a monthly report used by management to confirm timely resolution of these inquiries. This report groups escalations by topic and resolution timing: on live call, within 24 hours, or after 24 hours. The Company uses this report to monitor escalations internally and to ensure that customers receive a responsive resolution.

In the Test Year, 2025, the Company resolved 92% of customer complaints received though the internal escalation process within 24 hours. The table below details the total number of customer escalations received compared to the total number resolved within the 24-hour timeframe.

Table 1: Customer Escalations through Escalations Process

Year	Total Customer Escalations	Escalated & Resolved on Live Call	Escalated & Resolved within 24 Hours	Escalated & Resolved after 24 Hours	Total Calls Answered in Contact Centers
2025	11,193	9,348	10,403	790	1,479,600

[ii] EOE-095 Question:

(COMPLAINTS) Please explain how the Company defines what is considered as a customer complaint.

EOE-095 Response:

The Company defines formal complaints primarily as customer issues or inquiries that may be escalated from various formal channels including the Public Utilities Regulatory Authority (PURA), the Attorney General, elected officials, or internal departments such as Government Affairs. Complaints escalated to leadership through channels, such as email and U.S.P.S mail are also treated as complaints. However, not all complaints and/or escalations through these channels are interpreted as representing instances in which the Company has made an error, was non-compliant or failed to meet its obligations. Customers may file complaints for a variety of reasons including but not limited to customer inquiries, misunderstandings, disagreements with company policies or dissatisfaction with outcomes based on established practices.

The Company also intakes informal complaints through its customer escalations process as described in OCC-136[i]. These escalations, including general inquiries, billing questions, payment issues, cost or usage concerns, and customer experience concerns, are generally handled in real-time during live calls. The customer escalation process serves as an avenue for customers to raise the aforementioned items, allowing the Company an opportunity to investigate and resolve matters through internal channels and escalation procedures without entering the formal complaint process as described above.