Date Filed: August 14, 2026

Witness: Jessica B. Cain and Daniel M. Traynor
Request from: Office of Education, Outreach, and Enforcement

Question:

(PAYMENTS) Have there been any changes in the procedures or technologies utilized by Eversource to more timely identify customers demonstrating slow payment patterns or other signs of credit trouble? Please describe all ways in which the Company reaches out to these customers.

Response:

Yes. Since the last rate case, there have been several regulatory proceedings across several PURA dockets that have directed modifications to help identify customers needing assistance – primarily in the process area, supported by use of technology in additional and new ways.

As a reference, the following related dockets directed changes to, directed incorporation of stakeholder feedback on, and/or approved material changes to customer outreach, communications plans, inbound call handling, communication language and processes related to energy affordability assistance, protections, and arrears management programs:

- See Docket 24-05-01, 2024 Energy Affordability Annual Review, November 6, 2024, Decision at 25-26.
- See Docket 23-05-01, 2023 Energy Affordability Annual Review, October 11, 2024, Decision at 41.
- See Docket 22-07-01, 2022 Energy Affordability Annual Review, October 12, 2022, Decision at 33-39.
- See Docket 21-07-01, 2021 Application of the Connecticut Light and Power Company and Yankee Gas Services Company, each individually d/b/a Eversource Energy, The United Illuminating Company, Connecticut Natural Gas Corporation, and The Southern Connecticut Gas Company for Approval of Arrearage Forgiveness Program 2021-2022, October 13, 2021, Decision at 19-23.
- See also Docket 21-07-01, April 20, 2022, Decision at 22 directing additional modifications to customer communications stating:
    - "*…The Authority directs the EDCs and LDCs to update their internal and external communications, including, but not limited to CSR training materials, websites, and other customer communications, to clearly reflect the possibility of renegotiating an*

amortization agreement based on a showing of changed financial circumstances within the context of the payment arrangement offerings…"

- See Docket 20-03-15,[1] COVID Disconnect Moratorium in which PURA reviewed and approved and/or modified shut off communication plans, including but not limited to the following PURA decisions:
    - February 6, 2024, Ruling on Motion No. 90[1] - PURA grants with modification Eversource proposed communications plan.
    - August 6, 2021, Ruling on Motion No. 45[1] – PURA approves with modification processes, including customer communications, for the resumption of service terminations for non-hardship residential customers.

Since the last rate case, and as part of those modifications, programs, processes, communication content and methods across customer interaction channels have been redesigned. The Company created communications plans that aims to raise awareness and encourage customers to take advantage of the best programs, assistance, and protections for which they are eligible. There have been changes in how the Company communicates with its customers in several ways and across several channels supported by different technologies to provide the best assistance customers are eligible for when there are signs of late payment patterns or other signs of credit trouble.

1. *The Company's Communication Plan*: See the Company's response to EOE-093[i] Attachment 1, which provides a detailed summary of outreach campaigns such as geo-targeted paid advertising, cross marketing, and awareness campaigns along with direct USPS mail or electronic communications and materials available for delinquent (slow paying), low-income customers. This plan is under review for approval by PURA and submitted as "ES_06 Communication Plan" as part of Motion No. 7 in Docket No. 26-05-01[2].
2. *Inbound Calls – via Live Call Conversations:* PURA directed the use of CSR scripts in Docket No. 17-12-03RE01,[3] July 1, 2020, Decision at Order No. 4 (stating in part *". . . UI and Eversource shall incorporate the use of the CSR scripts provisionally approved herein into call center operations until otherwise ordered by the Authority.*"). The CSR scripts were further discussed in the Settlement Agreement approved with conditions in the

[1] Docket No. 20-03-15, Emergency Petition of William Tong, Attorney General for the State of CT, for a Proceeding to Establish a State of Emergency Utility Shut-off Moratorium.

[2] Motion No. 7 dated June 1, 2026, in Docket No. 26-05-01, Annual Review of Affordability Programs and Offerings.

[3] Docket No. 17-12-03RE01, PURA Investigation into Distribution System Planning of the Electric Distribution Companies – Energy Affordability.

Motion No. 43 Ruling in Docket No. 20-03-15.[4] The Motion No. 43 Ruling required PURA Office of Education, Outreach, and Enforcement ("EOE") to "to develop a standard review template for customer representative calls." The Company's Credit Call Handling Vendors utilize both the Approved Scripts and Call Review Template to ensure that customers, both hardship and non-hardship, are educated about financial hardship benefits and payment plans. See OCC-110[ii] Attachment 2.

3. *Inbound Calls – via Interactive Voice Response* ("IVR") *technology:* The Company also in recent years implemented a new up-front, hardship pre-qualification IVR call flow for all residential customers who call the Company about their past due balance or difficulty paying their bill. This automated customer experience informs customers that Eversource has programs available to help them pay their bill and automatically prompts them to answer a few short questions to see if they prequalify for financial hardship directly within the IVR. See EOE-093 Attachment 32, for the IVR customer messaging filed in August 2023. The Company filed the upfront credit IVR message in Docket No. 17-12-03RE11[5] to obtain approval of the LIDR messaging. PURA approved LIDR communications, including the IVR message, with modification in a July 31, 2023, Ruling on Motion No. 68 in Docket No. 17-12-03RE11; PURA required that the updated communications be filed as compliance in August 2023. EOE-081 Attachment 1, is the IVR message filed in the Docket No. 17-12-03RE11 August 24, 202023,ompliance filing, which was cross-posted in Docket No. 23-05-01, the 2023 Energy Affordability Annual Review.
4. *Payment Reminder notifications* – via automated email and/or text notifications, a few days prior to the customer's bill due date*;*
5. *Missed Payment notifications* – via automated email and/or text, a few days after the customer's bill due date;
6. *Matching Payment Plan* ("MPP") *notifications* – via automated email and/or text for customers on MPP who have missed a payment – see EOE-093 Attachment 21*;*
7. *Payment Needed notifications:*
    - *Medical Protection Customers* – via automated letter for medically protected customers who have missed a payment – see EOE-093 Attachment 14;
    - *Flexible Payment Plan* – via automated letter and automated email and/or text, sent on the following day.

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[4] Motion No. 43 Ruling dated July 13, 2021 in Docket No. 20-03-15; the Settlement Agreement filed June 23, 2021, as Motion No. 43, noted at page 2, "The Parties understand that the scripts are now guidance and cannot be followed precisely due to changes necessitated by Docket No. 20-03-15, and potentially other PURA orders."

[5] Docket No. 17-12-03RE11, PURA Investigation into Distribution System Planning of the Electric Distribution Companies – New Rate Designs and Rates Review.

8. *'Programs To Help Bill' Inserts:* Refer to the Company's response in EOE-094[iii], copied below.
9. *Outbound Calls:* Customer Outreach via outbound calls to notify customers of the option to set up Payment Plans and see if they are eligible for financial hardship or medical service protections.
10. *Eversource.com:* – for customer communication via web, refer to the Company's response in EOE-094 Attachment 7, copied below.
11. *Initial and Final Termination Notifications* – bill inserts as referenced in the Company's response to EOE-094, copied below.

Prior Referenced Responses:

[i] Q-EOE-093 Question:
(HARDSHIP) Describe the process(es) that the Company uses to educate customers regarding hardship designation and associated benefits and payment arrangements. Please include copies of all material currently provided to customers regarding hardship and its corresponding payment arrangements.

Q-EOE-093 Response:
The Company educates customers regarding hardship designation and associated benefits and payment arrangements in a variety of channels. For example, the Company's communications strategy and implementation are outlined annually in the Joint Arrears Management Plan, Communication Plan in Docket No. 26-05-01, *Annual Review of Affordability Programs and Offerings.* See EOE-093, Attachment 1.

The following outreach materials are included as attachments:

Financial Hardship Letters	• Heating w/50% low-income discount rate ("LIDR") Welcome Letter: EOE-093, Attachment 2 • 5%, 15%, 20%, 40% LIDR Heating Welcome Letter: EOE-093, Attachment 3 • Non-Heating w/50% LIDR Welcome Letter: EOE-093, Attachment 4 • 5%, 15%, 20%, 40% LIDR Non-Heating Welcome Letter: EOE-093, Attachment 5 • 60- & 30-Day Renewal Letter: EOE-093, Attachment 6 • 15-Day Renewal Letter: EOE-093, Attachment 7 • Expired: EOE-093, Attachment 8
Financial Hardship Digital Notifications	• Welcome: EOE-093, Attachment 9 • Renewal Reminder: EOE-093, Attachment 10 • Expired: EOE-093, Attachment 11
Medical Protection Letters	• Initial Claim: EOE-093, Attachment 12 • Welcome: EOE-093, Attachment 13 • Payment Reminder: EOE-093, Attachment 14 • Renewal Reminder: EOE-093, Attachment 15

	• 2nd Reminder to Renew: EOE-093, Attachment 16 • Removal: EOE-093, Attachment 17 • Infant Protection Claim: EOE-093, Attachment 18
Matching Payment Program ("MPP") Letters	• Welcome: EOE-093, Attachment 19 • Monthly Required Payment Change: EOE-093, Attachment 20 • Missed Payment Reminder: EOE-093, Attachment 21 • Removal due to Financial Hardship Expiration: EOE-093, Attachment 22 • Removal due to Missed Payments: EOE-093, Attachment 23 • Program Reinstatement: EOE-093, Attachment 24 • Program Completion: EOE-093, Attachment 25
MPP Digital Notifications	• EOE-093, Attachment 26 *(email and text)*
Connecticut Energy Assistance Program ("CEAP")	• EOE-093, Attachment 27 *(email)* • EOE-093, Attachment 28 *(letter)*
Heating Assistance Awareness Month	• EOE-093, Attachment 29 *(bill insert)* • EOE-093, Attachment 30 *(email*)
Targeted Community Outreach Campaign	• EOE-093, Attachment 31 *(email)*

Additionally, the Company promotes hardship designation and associated benefits and payment arrangements alongside other programs, like the non-hardship payment arrangement. For customers who *call* the Company, the live call conversation and the up-front IVR ensure that customers, hardship and non-hardship, are educated about financial hardship benefits and payment plans. See EOE-093, Attachment 32. For the IVR, 100% of customers who contact the Company's Credit Contact Center hear about and are prompted to prequalify for financial hardship.

Lastly, the Company uses a multi-channel communication strategy, including print, digital, web, traditional, and social media, to educate customers about year-round enrollment for financial hardship status and payment arrangements. Refer to the Company's response in EOE-094[i] for how non-hardship customers are educated about payment arrangements.

[ii] OCC-110 Question:
(CUSTOMER SERVICE) Please provide all written policies and procedures regarding the Company's quality assurance or other reviews of customer calls/customer service interactions with customers via the telephone, including reviews of internal and external CSRs.

OCC-110 Response:
Eversource views there to be value in having a robust Quality Assurance Program. Accordingly, the Company employs a thorough approach, designed to enhance and continuously improve the customer experience, not only for internal Customer Service Representatives ("CSRs") but also for CSRs at the Credit Call Handling third-party vendor (Alorica).

Training covers the expectations Eversource has for internal CSRs. This includes details ranging from how to properly process a move in request to how to answer questions about a bill to how to process a payment, along with many other areas. Extensive training is completed for the CSR to be prepared to support and assist customers.

To validate that CSRs are following the necessary requirements to resolve customer inquiries while providing them exceptional service, Eversource has built a comprehensive behavior-based internal Quality Assurance Program. This program provides the most effective and productive measure of accuracy of a customer service call.

Both external and internal CSRs are scored on an average of four (4) calls per month. It is important to note that these calls are not strictly for CL&P customers, as CSRs are also trained to support customers across other operating companies.

Internal employee Quality Assurance Program:

The Quality Assurance Program at Eversource is a behavior-based program designed to improve CSR interactions with customers by focusing on the words, actions, and approach taken by the CSR. Feedback is provided to CSRs through the Quality Assurance Call Form, which includes behaviors which should continue or be adjusted going forward. By highlighting both positive behaviors and behaviors which require adjustment, CSRs are able to maintain and improve skills which are a benefit to the customer while adjusting other behaviors designed to improve the customers' experience. Eversource provides feedback for every CSR monthly through the program. On average, all CSRs at Eversource will receive four feedbacks per month during an annual review period. Dedicated internal quality assurance teams, as well as local supervision, provide this feedback to CSRs. Calls are selected both at random by computer software and manually by call scorers, when necessary. The call scoring responsibility is shared across several team members to ensure the CSR benefits from multiple perspectives. CSRs are held accountable for their performance through call reviews and the Company's yearly performance management process.

External employee Quality Assurance Program:

For Alorica agents supporting the Company's credit calls, the CSRs undergo a thorough training to ensure they deliver information aligned with PURA's approved scripts. This approach ensures consistency in the communication provided to the customers, as the CSRs adhere closely to the guidelines laid out in the scripts. Please refer to PURA-approved scripts provided in Docket No. 17-12-03RE01, Interim Decision (July 1, 2020)[ii] and Call Review template in Docket No. 21-07-01, provided as OCC-110 Attachments 1 and 2.

The number of calls monitored per agent per month will vary based on factors such as tenure and past performance. However, a minimum of four (4) calls per agent per month must be monitored. Each third-party vendor Quality Assurance ("QA") specialist will monitor and provide a minimum of two (2) evaluations per agent per month. Also, vendor Supervisors may monitor additional calls over and above the four (4) call minimum set for each agent.

The Company has established specific parameters and mechanisms within the signed Alorica contract to ensure the vendor is held accountable for their performance quality. Please see OCC-110 Attachment 3 CONFIDENTIAL, under section 3.1.4 Training on pages 37-39, under section 3.1.5 Quality on page 40, and under section 7.4.1 Performance Criteria (KPIs) on pages 51-53.

Eversource's internal vendor management team also separately reviews more than one hundred additional, randomly selected Connecticut credit and collections calls handled by the Company's third-party vendor partner to validate their performance and ensure that all customers are being made aware of the best programs and protections available to them, as well as being made aware of weatherization and other energy efficiency programs. In addition, the Company's internal vendor management team holds weekly calibration sessions with the third-party vendor to ensure consistency and accuracy for Connecticut credit and collections calls.

[iii] EOE-094 Question:

(PAYMENT ARRANGEMENTS) Describe the process(es) the Company uses to educate customers regarding non-hardship payment arrangements. Please include copies of all materials currently provided to customers regarding all non-hardship payment arrangements.

EOE-094 Response:
The Company educates customers regarding non-hardship payment arrangements in a variety of channels that include USPS mail, on-bill messaging, digital notifications, bill inserts, web/social media, and through in-person or virtual outreach events.

Bill Messaging and Bill Inserts (included with bills):

- *Programs to Help* (sent monthly to residential customers from September through April). See EOE-094, Attachment 1.
- *Your Rights: Important Information About Your Service* (sent annually to all customers). See EOE-094, Attachment 2.
- *News for You* (sent daily in March and August through direct on-bill messaging). See EOE-094, Attachment 3
- *Get Help with your Bill* (sent daily to all customers when electronic bill is ready). See EOE-094, Attachment 4

Shut-off Inserts (included with shut-off letters):

- *A Shut Off Notice: What You Can Do* (sent year-round to residential customers). See EOE-094, Attachment 5.
- *Programs to Help* (sent year-round to residential customers). See EOE-094, Attachment 1.
- *Winter Protection* (sent to residential customers from November through April). See EOE-094, Attachment 6.

News, Web and Social Media:

- *Eversource.com/billhelp* (web page available to all customers). See EOE-094, Attachment 7.
- *Social Media Graphic* (graphic available on Eversource CT social media pages). See EOE-094, Attachment 8.
- *Get Help Customer Update* (digital newsletter sent periodically to residential customers the company has an email for). See EOE-094, Attachment 9.

In-Person or Virtual Event:

- *Bill Help* (business cards available during direct customer contact). See EOE-094, Attachment 10.
- *Bill Assistance* (annual virtual webinar targeted to residential non-hardship customers). Link to webinar example https://www.youtube.com/watch?v=HTNIN8dBLWo
- News Release. See EOE-094, Attachment 11.

Please refer to the Company's response in EOE-093[iii],which indicates how CL&P educates customers, including non-hardship customers, on financial hardship and payment plans.

- See OCC-110, Attachment 2, for a copy of the Call Review Template that is used as a guide by the Company's Credit Call Vendors during live call conversations to ensure that customers, hardship and non-hardship, are educated about financial hardship benefits and payment plans.

- In addition, on Eversource.com, customers who log in to their account who are eligible for the Matching Payment Program are automatically provided only that option – because it is the best option for them with the lowest monthly payment amounts and arrears forgiveness.

There have been several regulatory proceedings across several PURA dockets that have directed modifications in this area. The Company follows these regulatory directives on payment plans offered to non-hardship customers:

- Docket No. 20-03-15[iii]:
  - On July 6, 2022, PURA correspondence approved the Company's proposed commercial payment plans.[iii]
- Docket No. 21-07-01[iii]:
  - PURA's April 20, 2022 Decision[iii] at page 20 provided the Company with payment plan parameters in Table 3[iii] for non-hardship customers.

- Docket No. 24-05-01[iii]:
  - PURA's November 6, 2024 Decision[iii] and Order No. 2 modifies the payment required by non-financial hardship customers from 5%, or $25 to avoid shutoff up to 10% of a customer's arrearage.

- Docket No. 26-05-01[iii]:
  See EOE-094, Attachment 12, for payment plan offerings as filed on June 1, 2026 as Joint Attachment 04: How It Works_Payment Plans.