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Witness: Jared A. Lawrence, Shamus O'Brien, Edward A. Davis and Kimberly R. Parsons
Request from: Department of Energy and Environmental Protection

Question:

(TVR Customer Engagement Plan) Refer to CLP-RATES-8. Please explain how the Company will evaluate whether customers understand the structure and potential bill impacts of TVR rates including, but not limited to:

a. the metrics, performance targets, and data sources the Company will use, including, at a minimum, customer survey results, enrollment and opt-out rates, customer inquiries and complaints, and actual bill impacts.
b. how these results will be separately assessed for financial-hardship, medically protected, low-income, limited-English-proficiency, and other customer groups requiring additional protections.
c. the frequency of evaluation, how results will be reported to PURA, and what corrective actions the Company will take if customers demonstrate low understanding or experience material adverse bill impacts.

Response:

a. The Company intends to evaluate customer understanding of Time-Varying Rates ("TVR") through a combination of customer research, customer feedback, and operational metrics. As described in CLP-RATES-8, the Company intends to monitor customer feedback, inquiry trends, participation patterns, customer research results, awareness measures, engagement metrics, and enrollment metrics to assess the effectiveness of its customer engagement efforts. Customer research may include surveys designed to measure customer awareness of TVR offerings, understanding of program design and potential bill impacts, familiarity with available TVR options, and recall of Company communications regarding TVR programs. Engagement metrics may include click-through rates, email open rates, event attendance, web views, and engagement with social media posts. Enrollment metrics may include the number of customers enrolled in a TVR rate, as well as enrollment and opt-out activity. The Company also intends to monitor customer inquiries and complaints received through both formal and informal channels. To the extent available, the Company may evaluate customer bill impacts and customer experiences to help assess the effectiveness of customer education and engagement efforts. As discussed in CLP-RATES-8, the most effective time to engage customers regarding the benefits of TVR options is following full deployment of Advanced Metering Infrastructure ("AMI"), when customers will be better positioned to realize the full

benefits of TVR offerings, framed for them using at least one year of their own interval usage data. Full implementation of AMI will also provide interval usage data that will enable the Company to better understand customer participation, including how customers may shift electricity usage in response to TVR price signals and the resulting impacts on customer bills.

b. The Company intends to utilize customer account attributes maintained in its systems, including financial hardship and medical protection designations, to analyze and segment customer research results where appropriate. Such analysis may help identify customer segments that could benefit from additional education, outreach, or tailored communications regarding TVR programs. Although the Company does not maintain comprehensive language-preference information for all customers, it intends to offer survey participation opportunities in both English and Spanish and will use available information to evaluate customer understanding across customer groups when feasible.

c. The frequency of evaluation will depend on the metric being assessed and the timing and cadence of customer education, outreach, and engagement activities. The Company intends to monitor customer feedback, inquiries, complaints, and other relevant customer engagement metrics on an ongoing basis, while customer research activities, such as surveys, may be conducted periodically. The Company proposes reporting to PURA on its TVR Customer Engagement Plan, including all required documentation as directed by PURA, annually on June 1 following the Order in Docket No. 26-05-10. However, the Company notes that this reporting cadence may be adjusted or superseded by reporting requirements PURA may establish for a future AMI-related TVR customer engagement plan as an outcome of future AMI-related proceedings. The results of these evaluations will be used to inform and refine customer education, outreach, and engagement activities related to TVR offerings. Should the Company identify opportunities to improve customer understanding of TVR programs, it may modify communications, educational materials, outreach strategies, or other customer engagement efforts as appropriate.