Date Filed: September 15, 2026

Witness: Jessica B. Cain and Daniel M. Traynor
Request from: Office of Consumer Counsel

Question:

Exhibit CLP-CUSTOMER-1: Customer PIM Suite
(Average Discount Rate Enrollment Time) Please explain why a financial incentive for faster manual LIDR enrollment is necessary to advance customer affordability given the substantial enrollment already achieved through DSS data sharing and automatic enrollment. Please identify any analysis showing that faster manual processing would materially increase LIDR participation beyond levels achieved through those enrollment pathways.

Response:

Timely processing of proof of eligibility for, and enrollment in, the low-income discount rate ("LIDR") is important for eligible customers. The Company's proposed "Average Discount Rate Enrollment Time" metric[1] intends to measure and incentivize prompt LIDR enrollment *for customers who provide proof of eligibility directly to the Company for manual review and processing*. Achieving the proposed two-day turnaround takes a significant amount of resources and forecasting to plan for surge staff resources during annual peak times of year.

The Company clarifies this proposed metric:

- is *not* intended (or expected) to have *any* impact on LIDR participation and;
- would *not* include LIDR enrollment performed through DSS data-matching or Community Action Agencies (via Social Agency portal or receipt of LIHEAP) because those are automated and do *not* require a team of Company resources for manual review and processing.

Including the "*Average Discount Rate Enrollment Time*" measure within the PIM suite, and allowing for a positive financial incentive, as well as financial penalty, is appropriate because it provides the Company with an additional mechanism to encourage continuous improvement in the quality of customer interactions and reinforce behaviors that contribute to a positive customer experience. The five components of the customer PIM suite collectively reflect different aspects of the Company's service to customers and provide a more comprehensive measure of customer performance as discussed in response to OCC 527[1].

[1] The Company notes that it has this as a PBR metric in one if its Massachusetts Companies as well.

Prior Referenced Response:

[i] OCC-527 Question:

Exhibit CLP-CUSTOMER-1: Customer PIM Suite
(Level 1 DER Interconnection Processing) The RE02 Performance Evaluation System identifies Level 1 DER Interconnection as a standalone potential PIM. The Company instead proposes to include Level 1 DER Interconnection Processing as one of five components of its Customer PIM Suite. Please explain why the Company selected a composite structure rather than the standalone PIM identified in RE02, including how incorporating Level 1 DER Interconnection performance into the Customer PIM Suite is expected to improve interconnection performance.

OCC-527 Response:
The Company selected a composite PIM structure for its customer metrics, including Level 1 DER interconnection processing, because customer experience is multidimensional and more appropriately evaluated through a balanced set of performance measures rather than singularly measuring customer metrics in isolation. The five components of the customer PIM suite collectively reflect different aspects of the Company's service to customers and provide a more comprehensive measure of customer performance. Including Level 1 DER interconnection processing as one component of the composite PIM suite recognizes the importance of timely and effective interconnections processing, while avoiding placing disproportional emphasis on a single customer facing operational measure.

A standalone PIM for Level 1 DER interconnection processing could inadvertently prioritize focus on performance for this metric at the possible expense of other important customer outcomes. The composite structure instead encourages the Company to maintain balanced performance across a full range of customer-focused objectives.

The use of the composite PIM does not diminish the significance of Level 1 DER interconnection processing performance but rather recognizes that it is one of several important dimensions of customer service. The composite approach provides a more comprehensive performance framework that is less susceptible to unintended consequences for measuring, penalizing and/or rewarding customer performance versus a stand-alone PIM approach.