Interrogatory OCC-1

PMC Property Group
Docket No. 26-07-10

Witness: Louise Giordano

Q-OCC-1: Identify the PURA Docket authorizing submetering at each facility.

A-OCC-1: Some clarification of the list of properties is needed. Please note the following:

901 Main Street and 915 Main Street are one and the same property/development. 915 Main Street is merely the mailing address for the development.

26 Crown Street and 38 Crown Street are one and the same property/development. 38 Crown Street is merely the mailing address for the development.

238 College Street and 254 College Street are one and the same property/development. 254 College Street is merely the mailing address for the development.

214 State Street and 218 State Street are one and the same property/development. 218 State Street is merely the mailing address for the development.

There are no PURA dockets associated with 266 Pearl Street, 238 College Street (or 254 College Street) or 214 State Street because submetering of electricity has never occurred at any of said properties.

With respect 26 Crown Street (and 38 Crown Street), there was a PURA docket associated with that property - Docket No. 12-08-16 – but no electricity submetering or billing has occurred at that property since resolution of said docket.

Accordingly, electricity submetering is only occurring at three properties - 901 Main Street, 900 Chapel Street and 55 Trumbull Street. The docket numbers associated with those three properties are:

1. Docket No. 14-09-17 – 901 Main Street, Harford (referred to in said Docket as 915 Main Street).
2. Docket No. 14-09-18 - 55 Trumbull Street, Hartford.
3. Docket No. 14-10-21 – 900 Chapel Street, New Haven (comprised of Chapel Square Mall and Chapel Square Tower).

Interrogatory OCC-2

PMC Property Group
Docket No. 26-07-10

Witness: Rick Miller

Q-OCC-2: For each facility, indicate in an unlocked Excel spreadsheet:

a. The submeter(s) currently in use;

b. All dates in which a submeter was installed, tested, or inspected.

A-OCC-2:

a. See attached Exhibit OCC-2 - spreadsheet for 901 Main, 55 Trumbull and 900 Chapel;

b. See attached Exhibit OCC-2 - spreadsheet for 901 Main, 55 Trumbull and 900 Chapel.

Interrogatory OCC-3

Q-OCC-3: For each facility, please provide an unlocked Excel spreadsheet (either one Excel file per address or a different tab for each address) showing for each month from January 2016 through the present: the electric supplier with which PMC contracted for the address (or indicate the EDC standard service rate); the electric supply rate PMC paid; the electric supply rate PMC charged to the customer; and the total electric rate PMC charged the customer. If different customers were charged different rates, please provide each rate charged.

A-OCC-3: PMC objects to this request as overly broad, unduly burdensome, and not reasonably tailored to any specific allegation or issue in this proceeding. PMC further objects because the request seeks documents beyond the applicable record retention requirements. PURA's electric submetering regulations require submetering providers to retain customer complaints, service requests, utility billing records, and tenant billing and payment records for a period of three years. See Conn. Agencies Regs. § 16-11-106; PURA Docket No. 13-01-26, *Generic Investigation of Electric Submetering*, Interim Decision (Aug. 6, 2014), at 12. To the extent the request seeks records outside that retention period, it exceeds PMC's regulatory recordkeeping obligations and imposes an unreasonable burden. PMC further objects to the extent the request seeks information that is cumulative or duplicative. Subject to and without waiving these objections, PMC provides the following response:

See attached Exhibit OCC-3 – electric supplier information and rates for 901 Main, 55 Trumbull and 900 Chapel. See OCC-9 for additional information about how the tenant rate is calculated.

Q-OCC-4: Please provide for each facility:

a. An unlocked Excel spreadsheet (either one Excel file per address or a different tab for each address) showing for each month from January 2016 through the present the date on which you read the tenants' meters, who read the meter (either PMC or the vendor's name), and the corresponding date on which the electric distribution company (EDC) read the meter that month; and

b. All substantiation and/or documented evidence of each meter reading you conducted.

c. An explanation of all steps PMC has taken to align its meter reading dates with the EDC meter reading dates, and the dates on which each step was taken.

A-OCC-4: PMC objects to this request as overly broad, unduly burdensome, and not reasonably tailored to any specific allegation or issue in this proceeding. PMC further objects because the request seeks documents beyond the applicable record retention requirements. PURA's electric submetering regulations require submetering providers to retain customer complaints, service requests, utility billing records, and tenant billing and payment records for a period of three years. See Conn. Agencies Regs. § 16-11-106; PURA Docket No. 13-01-26, *Generic Investigation of Electric Submetering*, Interim Decision (Aug. 6, 2014), at 12. To the extent the request seeks records outside that retention period, it exceeds PMC's regulatory recordkeeping obligations and imposes an unreasonable burden. PMC further objects to the extent the request seeks information that is cumulative or duplicative. Subject to and without waiving these objections, PMC provides the following response:

a. See attached Exhibit OCC-4a – meter reading dates for 901 Main, 55 Trumbull and 900 Chapel.

b. Notwithstanding this objection, EMS is producing a report generated directly from its database that includes only the meter reads actually used for billing each period. See attached Exhibit OCC-4b.

c. For the AMR systems, EMS pulls the reads on the same day the utility reads the property. For manually read meters, EMS makes a reasonable attempt during account setup to read the property on the same schedule as the utility. However, this may fall out of sync if the utility changes their read schedule.

Interrogatory OCC-5

Q-OCC-5: How many meter tests have tenants requested from January 2016 to the present?

A-OCC-5: PMC objects to this request as overly broad, unduly burdensome, and not reasonably tailored to any specific allegation or issue in this proceeding. PMC further objects because the request seeks documents beyond the applicable record retention requirements. PURA's electric submetering regulations require submetering providers to maintain records relating to meter identification, meter installation and removal, and meter testing for a period of two years. See Conn. Agencies Regs. §§ 16-11-238(b), 16-11-132. To the extent the request seeks records outside that retention period, it exceeds PMC's regulatory recordkeeping obligations and imposes an unreasonable burden. PMC further objects to the extent the request seeks information that is cumulative or duplicative. Subject to and without waiving these objections, PMC provides the following response:

Over the past three years, the following number of meter tests were requested by tenants: two (55 Trumbull Street); four (900 Chapel Street) and three (901 Main Street).

See attached Exhibit OCC-5 and OCC-6 – meter test requests for 901 Main, 55 Trumbull and 900 Chapel.

- Additional Tests with pending results:
  - EMS 5398 – Chapel Square Mall, Unit 261 – Leviton Series 7000 Branch Circuit Meter
  - EMS 5402 – CSD Tower, PH-03 – Leviton Series 7000 Branch Circuit Meter
    - Results are expected in approximately 3–4 weeks.

Interrogatory OCC-6

Q-OCC-6: Please provide all results and reports from every meter test conducted by the Company (or conducted on behalf of the Company) from January 2016 to the present. If not apparent in the results/reports, please indicate who conducted each meter test.

A-OCC-6: PMC objects to this request as overly broad, unduly burdensome, and not reasonably tailored to any specific allegation or issue in this proceeding. PMC further objects because the request seeks documents beyond the applicable record retention requirements. PURA's electric submetering regulations require submetering providers to maintain records relating to meter identification, meter installation and removal, and meter testing for a period of two years. See Conn. Agencies Regs. §§ 16-11-238(b), 16-11-132. To the extent the request seeks records outside that retention period, it exceeds PMC's regulatory recordkeeping obligations and imposes an unreasonable burden. PMC further objects to the extent the request seeks information that is cumulative or duplicative. Subject to and without waiving these objections, PMC provides the following response:

See attached Exhibit OCC-5 and OCC-6 – meter test results for 901 Main, 55 Trumbull and 900 Chapel over the past three years. All meter tests were conducted by Metergy, with the exception of the Vision meter tests for the 900 Chapel units 224, 229 & 402, which were performed by Vision Metering Solutions.

Interrogatory OCC-7

Q-OCC-7: For each facility, please provide a copy of all submetering bills issued from January 2016 to the present.

A-OCC-7: PMC objects to this request as overly broad, unduly burdensome, and not reasonably tailored to any specific allegation or issue in this proceeding. PMC further objects because the request seeks documents beyond the applicable record retention requirements. PURA's electric submetering regulations require submetering providers to retain customer complaints, service requests, utility billing records, and tenant billing and payment records for a period of three years. See Conn. Agencies Regs. § 16-11-106; PURA Docket No. 13-01-26, Generic Investigation of Electric Submetering, Interim Decision (Aug. 6, 2014), at 12. To the extent the request seeks records outside that retention period, it exceeds PMC's regulatory recordkeeping obligations and imposes an unreasonable burden. PMC further objects to the extent the request seeks information that is cumulative or duplicative. Subject to and without waiving these objections, PMC provides the following response:

See attached Exhibit OCC-7 CONFIDENTIAL– tenant bills for 901 Main, 55 Trumbull and 900 Chapel.

Interrogatory OCC-8

Q-OCC-8: For each facility, please provide a copy of all EDC bills from January 2016 to the present.

A-OCC-8: PMC objects to this request as overly broad, unduly burdensome, and not reasonably tailored to any specific allegation or issue in this proceeding. PMC further objects because the request seeks documents beyond the applicable record retention requirements. PURA's electric submetering regulations require submetering providers to retain customer complaints, service requests, utility billing records, and tenant billing and payment records for a period of three years. See Conn. Agencies Regs. § 16-11-106; PURA Docket No. 13-01-26, *Generic Investigation of Electric Submetering*, Interim Decision (Aug. 6, 2014), at 12. To the extent the request seeks records outside that retention period, it exceeds PMC's regulatory recordkeeping obligations and imposes an unreasonable burden. PMC further objects to the extent the request seeks information that is cumulative or duplicative. Subject to and without waiving these objections, PMC provides the following response:

See attached Exhibit OCC-8 – EDC bills for 901 Main, 55 Trumbull and 900 Chapel.

Interrogatory OCC-9

Q-OCC-9: Please explain how PMC and/or its vendor calculates the rate charged to submetered customers for submetered electricity, including the exact formula that was/is used to determine the amount due by each submetered customer.

A-OCC-9: PMC objects to this request as overly broad, unduly burdensome, and not reasonably tailored to any specific allegation or issue in this proceeding. PMC further objects because the request seeks documents beyond the applicable record retention requirements. PURA's electric submetering regulations require submetering providers to retain customer complaints, service requests, utility billing records, and tenant billing and payment records for a period of three years. See Conn. Agencies Regs. § 16-11-106; PURA Docket No. 13-01-26, *Generic Investigation of Electric Submetering*, Interim Decision (Aug. 6, 2014), at 12. To the extent the request seeks records outside that retention period, it exceeds PMC's regulatory recordkeeping obligations and imposes an unreasonable burden. PMC further objects to the extent the request seeks information that is cumulative or duplicative. Subject to and without waiving these objections, PMC provides the following response:

See attached Exhibit OCC-9 for an explanation of how the rate charged to submetered customers of 901 Main, 55 Trumbull and 900 Chapel is calculated.

Interrogatory OCC-10

Q-OCC-10 In is Decisions in Docket Nos. 14-09-17 and 14-10-21, the Authority included several orders. For each order that required a compliance filing, please provide an unlocked Excel spreadsheet showing the order number, all dates on which PMC made that compliance filing, and a functioning URL link to the compliance filing in the respective docket. Please provide either a separate Excel file for each docket or a separate tab within the same Excel.

A-OCC-10: PMC objects to this request as overly broad, unduly burdensome, and not reasonably tailored to any specific allegation or issue in this proceeding. PMC further objects because the request seeks documents beyond the applicable record retention requirements. PURA's electric submetering regulations require submetering providers to retain customer complaints, service requests, utility billing records, and tenant billing and payment records for a period of three years. See Conn. Agencies Regs. § 16-11-106; PURA Docket No. 13-01-26, *Generic Investigation of Electric Submetering*, Interim Decision (Aug. 6, 2014), at 12. To the extent the request seeks records outside that retention period, it exceeds PMC's regulatory recordkeeping obligations and imposes an unreasonable burden. PMC further objects to the extent the request seeks information that is cumulative or duplicative.

Interrogatory OCC-11

Q-OCC-11: Please provide for each facility an unlocked Excel spreadsheet showing the dates on which each tenant's service was initiated and terminated and evidence, such as reports from contractors or other records, of PMC conducting initial and termination meter reads on those dates (Order # 4 and 14 in Docket No. 14-10-21 and Order #5 and 14 in Docket No. 14-09-17.) Id.

A-OCC-11: PMC objects to this request as overly broad, unduly burdensome, and not reasonably tailored to any specific allegation or issue in this proceeding. PMC further objects because the request seeks documents beyond the applicable record retention requirements. PURA's electric submetering regulations require submetering providers to retain customer complaints, service requests, utility billing records, and tenant billing and payment records for a period of three years. See Conn. Agencies Regs. § 16-11-106; PURA Docket No. 13-01-26, *Generic Investigation of Electric Submetering*, Interim Decision (Aug. 6, 2014), at 12. To the extent the request seeks records outside that retention period, it exceeds PMC's regulatory recordkeeping obligations and imposes an unreasonable burden. PMC further objects to the extent the request seeks information that is cumulative or duplicative. Subject to and without waiving these objections, PMC provides the following response:

See attached Exhibit OCC-11 – Tenant move-in/Move-out dates and information related to meter read processes for move-ins and move-outs for 901 Main, 55 Trumbull and 900 Chapel over the past three years.

Interrogatory OCC-12

Q-OCC-12: Please provide copies of submetering information given to tenants, including but not limited to notification of rate changes (Order #6 in 14-10-21 and Order #7 in Docket No. 14-09-17), general information packet on submetering (order #7 in Docket No. 14-10-21 and Order #8 in Docket No. 14-09-17), conservation package (order #9 in 14-10-21 and Order #10 in Docket No. 14-09-17), and Usage Exception Report (Order #10 Docket No. 14-10-21 and Order #11 in Docket No. 14-09-17). (Docket No. 14-10-21 at 10 and Docket No. 14-09-17 at 10.). If the date is not included on the notice/package, please indicate the date sent.

A-OCC-12: PMC objects to this request on the grounds that it is unduly burdensome, seeks information that is equally available to the requesting party from public sources, and improperly requires PMC to create a new document, compilation, or analysis that does not exist in the ordinary course of business. This request seeks publicly available information that is equally accessible to OCC through the Authority's online docket system. The request further requires PMC to create a new compilation and analysis by identifying compliance orders, locating associated filings, determining filing dates, and organizing that information into an unlocked Excel spreadsheet with functioning hyperlinks. PMC is not required to create documents that do not exist, perform research on OCC's behalf, or reformat publicly available information into a format designed by OCC. Because the requested information is readily obtainable from the Authority's public docket records, the request is unduly burdensome and disproportionate to the needs of this proceeding.

The general information packet, which also includes a copy of the conservation package and other billing information is distributed to tenants annually in March. See attached Exhibit OCC-12 for a copy of these documents. Tenant bills provide a link to the EMS customer portal at www.EMS3.com, where tenants can access prior invoices, historical usage, and meter reading data. See Exhibit OCC-12 for a copy of a sample tenant bill. EMS periodically monitors tenant consumption, and as applicable sends a report to PMC identifying any abnormal usage. PMC reviews the report and arranges for the meters to be troubleshooted or tested, as needed. Tenants are also informed through the general information packet that is distributed annually about their rights to request a meter accuracy test every twelve months at no charge, to dispute any bill, as well as to review and inspect billing and electric use records for any abnormalities.

Q-OCC-13: For each facility:

a. Provide the total number of submeters at the facility;

b. Of the number provided in (a), how many require manual reads?;

c. Please explain why PMC continues to use meters requiring manual reads;

d. When does PMC plan to upgrade the manual read meters to an Automatic Meter Reading?

A-OCC-13:

a. - b. 901 Main

Electric meter total: 109; Manual total: 0

55 Trumbull

Electric meter total: 149; Manual total: 0

900 Chapel (Chapel Sq Mall)

Electric meter total: 144; Manual total: 96

900 Chapel (CSD Tower)

Electric meter total: 123; Manual total: 49

c. PMC continues to utilize manually read meters because replacing the existing meters with AMR or AMI technology would require significant capital investment. The costs associated with purchasing and installing new meters, as well as the infrastructure necessary to support an automated metering system, would be substantial. Unlike a regulated utility, PMC does not have a mechanism to earn a return on such investments or otherwise recover the costs of a system-wide meter replacement. As a result, the costs of upgrading the meters would far outweigh the benefits that the technology would provide.

d. At this time, PMC has no plans to replace its manually read meters with an automatic meter reading system. PMC believes that continuing to use the existing metering system remains the most cost-effective approach while still providing accurate measurement of electric usage.