

**Rule 25-6.094 and Rule 25-6.021 Proposed Amendments**  
**Joint Discussion Document of Florida Power & Light Company, Tampa Electric Company,**  
**Gulf Power Company, Duke Energy Florida, and Florida Public Utilities Company**

**April 19, 2017 Workshop**

<b>Rule</b>	<b>Current</b>	<b>FPSC Initial Proposal</b>	<b>IOU Proposal</b>	<b>Comments</b>
25-6.094 Complaints and Service Requests	(1) The utility shall make a full and prompt investigation of all customer complaints and other service requests. The word “complaints” as used in this rule shall be construed to mean substantial objection made to a utility by a customer as to its charges, facilities, or service, the disposal of which complaint requires investigation or analysis. Each utility shall provide a means of receiving and promptly responding to emergency calls on a 24-hour per day basis.	<del>(1) The utility shall make a full and prompt investigation of all customer complaints and other service requests. The word “complaint” means an as used in this rule shall be construed to mean substantial objection made to a utility by a customer as to its charges, facilities, or service, the resolution disposal of which complaint requires action by the utility investigation or analysis.</del>	<del>(1) The utility shall make a full and prompt investigation of all customer complaints and other service requests. The word “complaint” means <u>an</u> as used in this rule shall be construed to mean substantial <u>a phone call, e-mail, or letter from a customer objection made to a utility by a customer as to its objecting to the utility’s charges, facilities, or service, the resolution disposal of which complaint requires action by the utility investigation or analysis. is not resolved within the utility’s routine customer contact and escalation processes.</u></del>  Clean Version:  (1) The word “complaint” means a phone call, e-mail, or letter from a customer objecting to the utility’s charges, facilities, or service which is not resolved within the utility’s routine customer contact and escalation processes.	The joint IOUs’ proposed language aligns with the companies’ current processes, yet achieves the rule amendment goals of utilizing simple, clear language that could be standardized across regulated industries <ul style="list-style-type: none"> <li>• Includes complaints to FPSC, DOAC/other agencies, BBB, utility executives, and the media</li> <li>• E-mails specifically included, consistent with OPC’s workshop comments</li> <li>• Excludes social media communications (they are not “e-mails”)</li> <li>• Broader than complaints handled pursuant to Rule 25-22.032</li> </ul> An expansion of the definition of “complaint” would require changes to systems and processes, and additional FTEs, driving significant costs that would likely trigger legislative ratification pursuant to §120.541(3)

**Rule 25-6.094 and Rule 25-6.021 Proposed Amendments  
 Joint Discussion Document of Florida Power & Light Company, Tampa Electric Company,  
 Gulf Power Company, Duke Energy Florida, and Florida Public Utilities Company**

**April 19, 2017 Workshop**

Rule	Current	FPSC Initial Proposal	IOU Proposal	Comments
	(2) Reports of electrical conditions wherein property damage or personal injury is reasonably foreseeable are to be considered as emergencies requiring immediate attention commensurate with ability to provide performance in situations resulting from acts of God.	<u>(2) No later than the next working day after the date the utility receives a customer complaint, the utility shall inform the customer that the utility has received the customer’s complaint. Within 15 working days of the utility’s receipt of the complaint, the utility shall investigate the complaint and give the customer a verbal or written response.</u>	<u>(2) No later than the next working day after the date the utility’s <del>complaint</del> resolution function receives a customer complaint, the utility shall <del>inform</del> notify the customer that the utility has received the customer’s complaint. Within 15 working days of <del>the utility’s</del> receipt of the complaint, the utility shall investigate the complaint and give the customer a verbal or written response.</u>	There could be some lag time between when a utility’s corporate mail room or field office receives a letter and when that letter is routed to the utility’s complaint resolution function with the responsibility for acknowledging and responding  Suggestion to change “inform” to “notify” made at first workshop
25-6.094 Complaints and Service Requests		<u>(3) Each utility shall have a procedure for <del>provide a means of</del> receiving and promptly responding to emergency calls 24 hours a <del>on a 24 hour per day</del> basis.</u>		Fine with (3)  In light of sections (3) and (4), suggest including in title of rule “and Emergency Response” or something similar (raised at first workshop)
		<u>(4) Reports of electrical conditions wherein property damage or personal injury is reasonably foreseeable <del>shall are to</del> be considered as emergencies requiring prompt response subject to safe work practices required by Rule 25-6.039, F.A.C. <del>immediate attention commensurate with ability to provide performance in situations resulting from acts of God.</del></u>		Fine with (4)

**Rule 25-6.094 and Rule 25-6.021 Proposed Amendments**  
**Joint Discussion Document of Florida Power & Light Company, Tampa Electric Company,**  
**Gulf Power Company, Duke Energy Florida, and Florida Public Utilities Company**

**April 19, 2017 Workshop**

Rule	Current	FPSC Initial Proposal	IOU Proposal	Comments
25-6.021 Record of Complaints	Each utility shall keep a record of all written complaints received. The record shall show the name and address of the complainant, the date received, the nature of the complaint, the result of any investigation, the disposition of the complaint and the date of such disposition. Cf. subsection 25-6.094(1), F.A.C., for the definition of “complaint” for the purpose of this rule.	(1) Each utility shall keep a record of all <del>written</del> complaints received. The record shall show the name and address of the complainant; the date received; the nature of the complaint; the result of any investigation; <del>how disposition of the complaint was resolved</del> ; and the date of <u>resolution</u> <del>such disposition</del> . <u>The word “complaint” as used in this rule is defined in Cf. subsection 25-6.094(1), F.A.C., for the definition of “complaint” for the purpose of this rule.</u>	(1) Each utility shall keep a record of all <del>written</del> complaints received. The record shall show the name and address of the complainant; the date received <u>by the utility’s complaint resolution function</u> ; the nature of the complaint; the result of any investigation; <del>how disposition of the complaint was resolved</del> ; and the date of <u>resolution</u> <del>such disposition</del> <u>such disposition</u> . <u>The word “complaint” as used in this rule is defined in Cf. subsection 25-6.094(1), F.A.C., for the definition of “complaint” for the purpose of this rule.</u>	<p>The joint IOUs would prefer to restore the language concerning “disposition of the complaint” and “the date of such disposition,” as it is a more accurate description of what current systems and processes capture</p> <p>If the change is made for record keeping to reflect “resolution,” we seek confirmation that it may be interpreted the same as “disposition,” which for the joint IOUs reflects the date a ticket is closed (recognizing additional work may occur following that date, as discussed with the customer)</p> <p>Edits regarding “date received” to maintain consistency with suggestions for 25-6.094(2)</p> <p>Would utilities have discretion to combine certain categories into a single system/report field?</p>

**Rule 25-6.094 and Rule 25-6.021 Proposed Amendments**  
**Joint Discussion Document of Florida Power & Light Company, Tampa Electric Company,**  
**Gulf Power Company, Duke Energy Florida, and Florida Public Utilities Company**

**April 19, 2017 Workshop**

<b>Rule</b>	<b>Current</b>	<b>FPSC Initial Proposal</b>	<b>IOU Proposal</b>	<b>Comments</b>
		<p><u>(2) Each utility shall maintain the record of complaints for a minimum of five years and shall provide it to the Commission upon Commission staff's request. Documentation relating to customer complaints processed under Rule 25-22.032, F.A.C., shall be retained as set forth in paragraph 25-22.032(10)(a), F.A.C.</u></p>	<p><u>(2) Each utility shall maintain the record of complaints for a minimum of five years <b>from the date received by the utility's complaint resolution function,</b> and shall provide it to the Commission upon Commission staff's request. Documentation relating to customer complaints processed under Rule 25-22.032, F.A.C., shall be retained as set forth in paragraph 25-22.032(10)(a), F.A.C.</u></p>	<p>Edits regarding "date received" to maintain consistency with suggestions for 25-6.094(2)</p>