

**ORIGINAL
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

**GULF POWER COMPANY
~~DOCKET NUMBER 891345-EI~~**

TESTIMONY OF

KATHRYN DYAL BROWN

MARCH, 1990

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FPSC-RECORDS/REPORTING

- 1 Q. State your name and address.
- 2 A. Kathryn Dyal Brown, 101 E. Gaines Street, Tallahassee,
3 Florida 32399.
- 4 Q. Where are you employed?
- 5 A. I am employed in the Consumer Affairs Division of the Florida
6 Public Service Commission.
- 7 Q. Briefly describe your position and duties.
- 8 A. As a Senior Consumer Affairs Analyst, I receive and
9 investigate complaints against regulated utilities. I work
10 with utility companies and their customers to achieve
11 resolution of complaints. I provide explanation and
12 counseling on various matters related to utility company rates
13 and service and compliance with PSC rules and utility company
14 tariffs. I keep records of complaint activity filed against
15 utilities and prepare reports and charts outlining this
16 activity.
- 17 Q. Describe the nature of your testimony.
- 18 A. My testimony will set forth the complaint activity in the
19 Consumer Affairs Division involving Gulf Power Company.
20 Exhibits will show the number and type of complaints received,
21 the justification for the customer having contacted the
22 commission, and the complaint activity of Gulf Power Company
23 compared with other electric companies.
- 24 Q. What time period will your testimony encompass?
- 25 A. My testimony will focus on the complaint activity of calendar

- 1 years 1985-1989. The months of January, February and March
2 1990 will also be included.
- 3 Q. Describe any preliminary screening that may take place before
4 a complaint is logged to be investigated.
- 5 A. A complaint is not logged unless the analyst receiving the
6 contact determines that the matter appears to be within the
7 jurisdiction of the commission and that there is reason to
8 believe that the complaint may be justified. If it appears
9 there is nothing the commission can do to help, or the
10 complaint is clearly not justified, the citizen is so advised.
- 11 Q. What procedure is followed when a complaint is logged?
- 12 A. Information is entered on a consumer request form and the
13 company is requested to review the complaint and respond.
14 When the response has been received, both the complaint and
15 the response are reviewed by Consumer Affairs personnel to
16 determine compliance with commission rules and company tariffs
17 and to determine what other action, if any, needs to be taken.
18 Before a complaint is closed, the analyst handling the case
19 customarily contacts the complainant to verify his
20 satisfaction or discuss the action taken and the applicable
21 rules and tariffs.
- 22 Q. How many complaints were logged against Gulf Power Company
23 during 1989?
- 24 A. Records show that 76 complaints (.308 per 1000 customers) were
25 logged against Gulf Power Company during 1989.

- 1 | Q. How do these figures compare with complaint activity for 1988?
- 2 | A. Complaints were up 33% from 1988. There were 76 complaints
3 | logged against the company during 1989, compared to 57 during
4 | 1988.
- 5 | Q. How do these figures compare with complaint activity figures
6 | for the preceding calendar years?
- 7 | A. This comparison is shown in Attachment I. Attachment I is a
8 | graph of Gulf Power's complaint activity for the past 10
9 | years. Listed below the graph are the actual number of
10 | complaints received during those years and the number of
11 | complaints received per 1000 customers.
- 12 | Q. Do Consumer Affairs records show what part of Gulf Power's
13 | service area had the most complaints?
- 14 | A. The majority of the company's complaints originated in
15 | Escambia county, where complaints more than doubled from 1988
16 | figures. During 1989 customers in Escambia county logged 33
17 | complaints followed by Santa Rosa (18), Bay (10), Okaloosa
18 | (12), and Washington (3).
- 19 | Q. What types of complaints were received against Gulf Power
20 | Company during 1989?
- 21 | A. During 1989, Consumer Affairs received 45 complaints about
22 | billing and 31 about service related matters.
- 23 | Q. Are complaints classified more specifically?
- 24 | A. Yes. After an analyst takes a complaint he or she determines
25 | whether the complaint is related to a service or billing

- 1 problem. Then the analyst chooses one of approximately 30
2 more specific classification categories to further identify
3 the complaint.
- 4 Q. What were the major types of complaints received against Gulf
5 Power during 1989?
- 6 A. The two major complaint categories were high bills and delayed
7 new connections. Although complaints were up slightly in a
8 number of different categories, no one particular type of
9 complaint contributed to the increase.
- 10 Q. Have you made a more specific study on the type of problems
11 complained about?
- 12 A. Yes. Attachment IIA sets forth in more detail the various
13 types of complaints which were received and closed during
14 1989, and the justification for each type. Attachment IIB is
15 a chart illustrating the major types of complaints received
16 against Gulf Power.
- 17 Q. How is justification for a complaint determined?
- 18 A. When the complaint analyst reviews the company's report and
19 closes the complaint, the analyst determines whether the
20 complaint was justified, not justified or had some
21 justification. The determination is noted on the complaint
22 file. In each case, determination is based on commission
23 rules, company tariffs, and/or common sense guidelines. Every
24 effort is made to be as objective as possible.
- 25 Q. What was the justification for the Gulf Power Company

1 | complaints closed during 1989?

2 | A. During 1989, 66 complaints against the company were received
3 | and closed. Of these, 14 were found to be justified, 34 were
4 | not justified, and 18 were found to have some justification.
5 | These figures are shown in Attachment III.

6 | Q. Have you compared the justification for the complaints closed
7 | to previous periods?

8 | A. Yes. These figures are also in Attachment III.

9 | Q. Have you compared the complaint activity of Gulf Power Company
10 | with that logged against other companies?

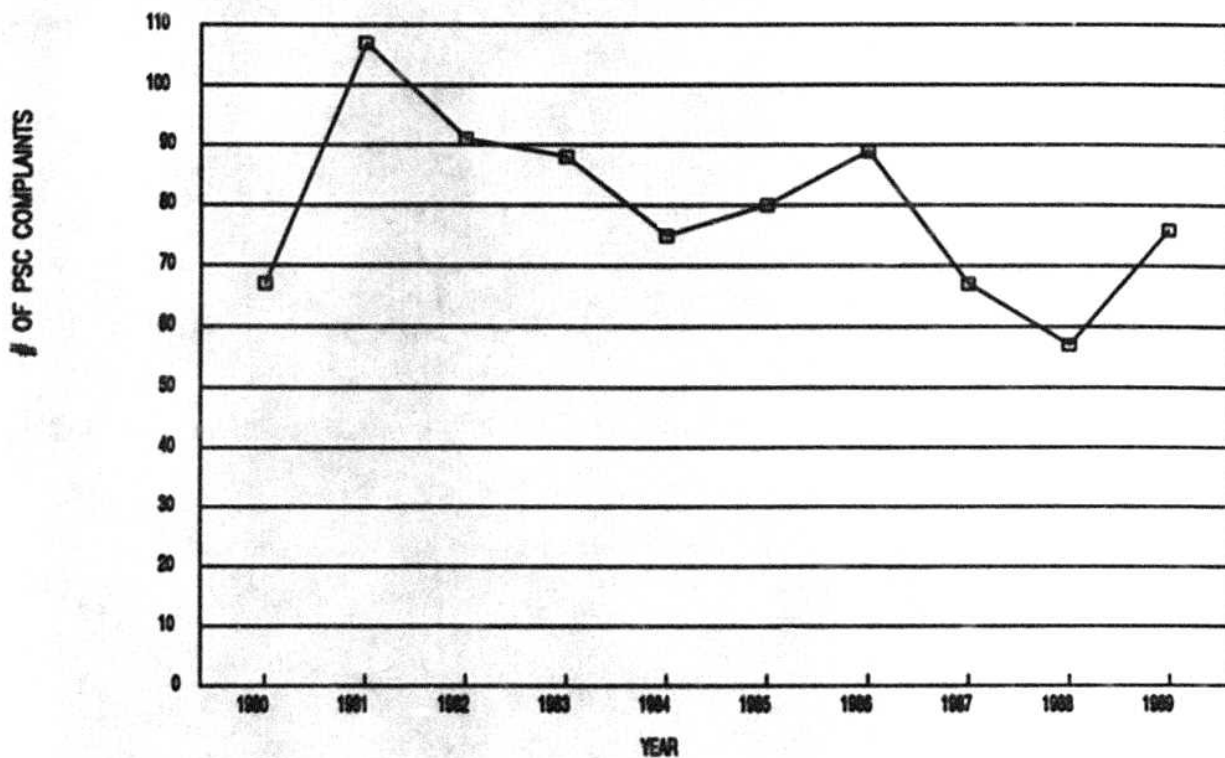
11 | A. Yes. Attachments IVA and IVB compare all electric companies
12 | for the calendar years 1985 through 1989 and include the
13 | number and type of complaints logged, the percentage of
14 | increase from the previous year, a breakdown of the
15 | justification, the number of complaints and justified
16 | complaints per 1000 customers and industry totals.

17 | Q. How does Gulf Power Company compare to the other electric
18 | utilities in the areas you have analyzed?

19 | A. After a two year downward trend in complaint activity, Gulf
20 | Power complaints increased by 33 percent in 1988. The
21 | percentage of logged complaints found to be justified
22 | increased from 13 percent in 1988 to 21 percent in 1989.
23 | Fifty-two percent of Gulf Power complaints were found to have
24 | no justification. After three years of maintaining the lowest
25 | number of complaints and justified complaints per 1000

- 1 customers, Gulf Power had the second highest number of
2 complaints and justified complaints of any of the four major
3 electric utilities during 1989. There were .308 complaints
4 per 1000 customers, and .057 justified complaints per 1000
5 customers as shown on Attachment IVA and IVB.
- 6 Q. Have you compiled data on the number and type of complaints
7 received against Gulf Power in 1990?
- 8 A. Yes, Attachment V shows the number, major type and
9 justification of complaints received against Gulf Power and
10 all other electric utilities during the first quarter of 1990.
- 11 Q. What observations have you made from the 1990 complaint data?
- 12 A. For the first three months of 1990 Gulf Power had the fewest
13 complaints per 1000 customers of the five regulated electric
14 companies. Of the complaints closed in January, February and
15 March of 1990 only Florida Power Corporation had fewer
16 justified complaints per 1000 customers than Gulf Power
17 Company. Gulf Power is the only company that had a drop in
18 the total number of complaints received during 1990 in
19 comparison with the same three months of 1989.
- 20 Q. Does this conclude your testimony?
- 21 A. Yes.

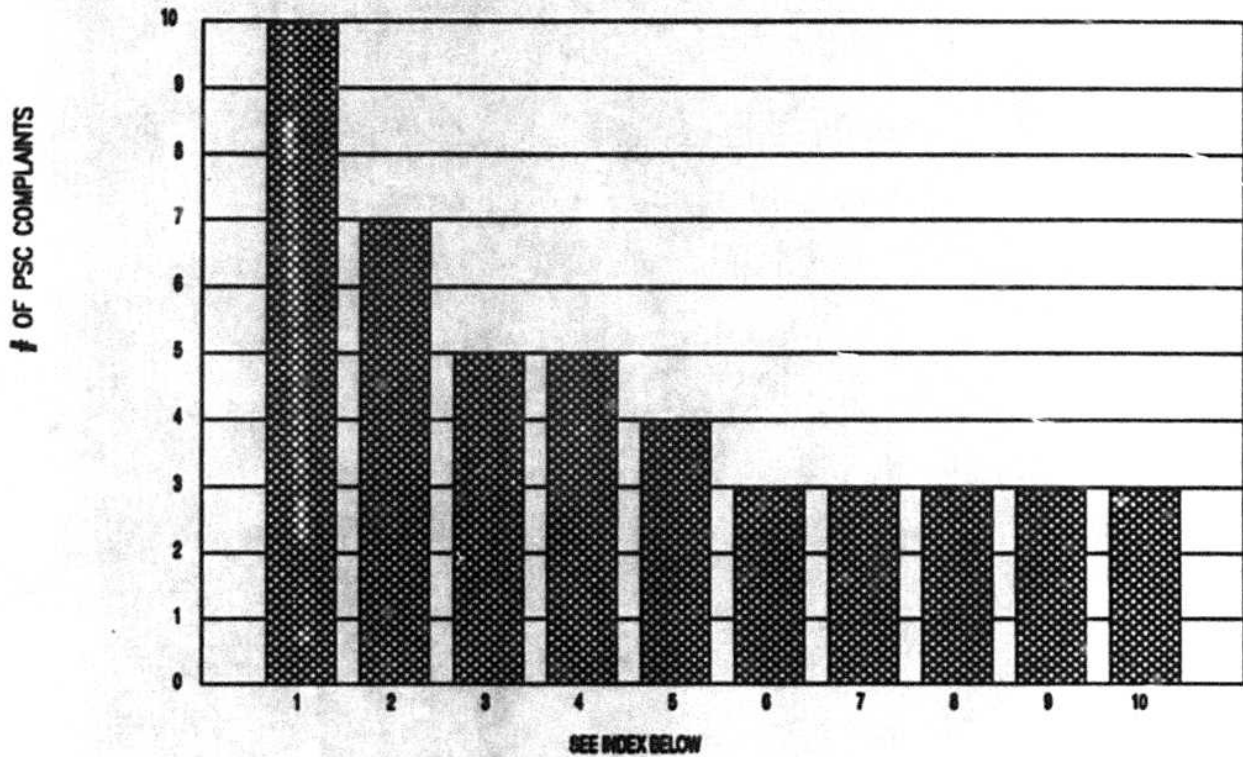
GULF POWER COMPANY LOGGED COMPLAINTS 10 YEAR COMPARISON



<u>YEAR</u>	<u>NUMBER COMPLAINTS LOGGED</u>	<u>PER 1000 CUSTOMERS</u>
1989	76	.308
1988	57	.236
1987	67	.285
1986	89	.391
1985	80	.368
1984	75	.371
1983	88	.403
1982	91	.431
1981	107	.530
1980	67	Not Available

TYPE AND JUSTIFICATION FOR GULF POWER
COMPLAINTS RECEIVED AND CLOSED DURING 1989

TYPE	JUSTIFIED	NOT JUSTIFIED	SOME JUSTIFICATION	# TOTAL	% OVER-ALL	% JUSTIFIED OR SOME JUSTIFICATION
SERVICE						
Improper Disconnect	3	2		5	6.76%	60%
Delay Connect/New Location	2	3	2	7	9.46%	57%
Momentary Outages		1	1	2	2.70%	50%
Voltage or Surges		3		3	4.05%	0%
Business Office Problem	1	1		2	2.70%	50%
Service Outage		1	1	2	2.70%	50%
Delay Reconnect/After Cut	1			1	1.35%	100%
Tree Trim		1	2	3	4.05%	67%
Street Lights			2	2	2.70%	100%
Employee Rude		1		1	1.35%	0%
Relocate or Remove Equipment		1		1	1.35%	0%
	7	14	8	29	39.18%	51%
BILLING						
Meter Reading Problem	1	1	1	3	4.05%	67%
Not Disconnected on Request			1	1	1.35%	100%
Payment Not Credited		3	2	5	6.76%	40%
Backbilling	1			1	1.35%	100%
Connection or Misc. Serv. Charge		1		1	1.35%	0%
Deposit/Additional		4		4	5.41%	0%
Miscellaneous Billing	1	2		3	4.05%	33%
Improper Cut Notice		1		1	1.35%	0%
Billing Wrong customer		1	1	2	2.70%	50%
Delay in Refund or Credit	1		1	2	2.70%	100%
Deposit/New	1		1	2	2.70%	100%
Agreement Broken		2	1	3	4.05%	33%
Improper Rates Applied	2			1	2.10%	100%
Relocate Equipment		1		1	1.35%	0%
High Bill		9	1	10	13.51%	10%
Collection Agency		1		1	1.35%	0%
Contribution-In-Aid			1	1	1.35%	100%
Reconnect Charge		1		1	1.35%	0%
Current Diversion		1		1	0.00%	0%
	7	28	10	45	60.81%	38%

GULF POWER COMPANY*Complaints By Type - 1989*

1. High Bill
2. Delay Connect
3. Payment Not Credited
4. Improper Disconnect
5. Additional Deposit
6. Meter Reading Problem
7. Agreement Broken
8. Voltage or Surges
9. Miscellaneous Billing
10. Tree Trim

JUSTIFICATION FOR GULF POWER COMPANY COMPLAINTS

	1985		1986		1987		1988		1989	
	#	%	#	%	#	%	#	%	#	%
Justified	14	18%	13	15%	6	9%	7	13%	14	21%
Not Justified	47	61%	56	63%	51	76%	38	64%	34	52%
Some Justification	16	21%	20	22%	10	15%	12	23%	18	27%
TOTALS	77		89		67		57		66	

ELECTRIC INDUSTRY
CALENDAR YEAR COMPARISON
OF COMPLAINT ACTIVITY

	COMPLAINTS RECEIVED			PERCENT CHANGE FROM PREVIOUS YEAR	% OF JUSTIFICATION FOR COMPLAINTS CLOSED			COMPLAINTS PER 1000 CUSTOMERS	JUSTIFIED COMPLAINTS PER 1000 CUSTOMERS*
	# SERVICE	# BILLING	# TOTAL		YES	NO	SOME		
1989									
Florida Power Corp.	120	146	266	0%	13%	66%	21%	.275	.035
Florida Power & Light	371	434	805	-16%	32%	46%	22%	.301	.092
Florida Public Utilities	3	3	6	20%	0%	100%	0%	.362	.000
Gulf Power Company	31	45	76	33%	21%	52%	28%	.308	.057
Tampa Electric Company	60	79	139	31%	13%	60%	26%	.357	.049
INDUSTRY TOTALS	585	707	1292	-13%	25%	52%	23%	.301	.073
PERCENTAGES	45%	55%							
1988									
Florida Power Corp.	146	119	265	-5%	21%	51%	18%	.282	.060
Florida Power & Light	422	531	953	-25%	32%	49%	18%	.370	.123
Florida Public Utilities	5	0	5	67%	20%	60%	20%	.310	.124
Gulf Power Company	26	31	57	-15%	13%	65%	23%	.236	.033
Tampa Electric Company	65	137	202	-22%	22%	59%	19%	.531	.166
INDUSTRY TOTALS	664	818	1482	-21%	29%	52%	21%	.357	.103
PERCENTAGES	45%	55%							
1987									
Florida Power Corp.	143	135	278	-20%	21%	57%	22%	.309	.067
Florida Power & Light	528	740	1268	-16%	26%	53%	21%	.511	.140
Florida Public Utilities	1	2	3	-25%	33%	33%	33%	.191	.064
Gulf Power Company	34	33	67	-25%	9%	76%	15%	.285	.025
Tampa Electric Company	111	149	260	26%	23%	54%	23%	.725	.167
INDUSTRY TOTALS	817	1059	1876	-13%	25%	57%	22%	.470	.119
PERCENTAGES	44%	56%							

*BASED ON AVERAGE NUMBER OF CUSTOMERS FOR PREVIOUS YEAR

ELECTRIC INDUSTRY
CALENDAR YEAR COMPARISON
OF COMPLAINT ACTIVITY

	COMPLAINTS RECEIVED				PERCENT CHANGE FROM PREVIOUS YEAR	% OF JUSTIFICATION FOR COMPLAINTS CLOSED			COMPLAINTS PER 1000 CUSTOMERS	JUSTIFIED COMPLAINTS PER 1000 CUSTOMERS*
	# SERVICE	# BILLING	# OTHER	# TOTAL		YES	NO	SOME		
1986										
Florida Power Corporation	133	183	33	349	50%	16%	65%	19%	.404	.066
Florida Power & Light	489	820	194	1503	-25%	23%	59%	18%	.631	.145
Florida Public Utilities	0	4	0	4	100%	25%	75%	0%	.262	.066
Gulf Power Company	36	46	7	89	11%	15%	63%	22%	.391	.057
Tampa Electric Company	64	128	15	207	8%	22%	60%	18%	.586	.122
INDUSTRY TOTALS	722	1181	249	2152	-14%	22%	60%	18%	.560	.199
PERCENTAGES										
1985										
Florida Power Corporation	103	88	41	232	-15%	24%	65%	11%	.279	.066
Florida Power & Light	582	1051	364	1997	-82%	24%	60%	16%	.868	.214
Florida Public Utilities	0	2	0	2	-60%	100%	100%	0%	.116	.0
Gulf Power Company	46	28	6	80	20%	18%	61%	21%	.368	.064
Tampa Electric Company	63	97	31	191	-16%	19%	53%	27%	.564	.109
INDUSTRY TOTALS	794	1266	442	2502	-85%	24%	60%	16%	.680	.162
PERCENTAGES										

*BASED ON AVERAGE NUMBER OF CUSTOMERS FOR PREVIOUS YEAR

JANUARY - MARCH, 1990
DIVISION OF CONSUMER AFFAIRS COMPLAINT ACTIVITY
ELECTRIC INDUSTRY

	<u>Service</u>	<u>Billing</u>	<u>Major Type</u>	<u>Yes</u>	<u>No</u>	<u>Some</u>	<u>% Justified</u>
Florida Power	39	33	High Bill	4	31	18	8%
FPL	90	95	High Bill	51	95	26	27%
FPUC	1	1	None	1	2	0	33%
Gulf Power	4	9	High Bill	2	15	1	11%
Tampa Electric	16	36	High Bill	5	26	9	13%
INDUSTRY TOTAL	150	173	High Bill	63	169	54	22%

	<u>1990 Total Rec'd</u>	<u>Percent Change From '89</u>	<u>Complaints Per 1000 Customers</u>	<u>Justified Per 1000 Customers</u>
Florida Power	72	24%	0.072	0.006
FPL	185	23%	0.067	0.025
FPUC	2	100%	0.177	0.059
Gulf Power	13	-13%	0.052	0.008
Tampa Electric	52	58%	0.130	0.018
INDUSTRY TOTAL	324	26%	0.073	0.019

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Gulf Power Company) DOCKET NO. 891345-EI
for an increase in its rates and)
charges.)
_____)

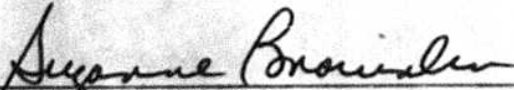
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Direct Testimony of Kathryn Dyal Brown has been served by First Class U. S. Mail, postage prepaid, on Edison Holland, Jr., Esquire (Gulf Power Company), Beggs and Lane, Post Office Box 12950, Pensacola, Florida 32576, with copies to the following parties of record, this 27 day of April, 1990 :

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