



REDACTED

September 18, 2012

Ms. Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0850

claim of confidentiality
 notice of intent
 request for confidentiality
 filed by OPC

For DN 06292-12, which
is in locked storage. You must be
authorized to view this DN.-CLK

RE: Docket No. 120200-EI

Dear Ms. Cole:

Enclosed are an original and seven copies of Gulf Power Company's Request for Confidential Classification of portions of Commission audit staff's workpapers pertaining to the Review of Investor-owned Utilities' Payment Arrangement Programs. Also included is a DVD of Gulf's Request for Confidential Classification and Exhibit C in Microsoft Word format.

Sincerely,

Robert L. McGee
Regulatory & Pricing Manager
mw

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TEL _____
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Enclosures
cc: Beggs & Lane
Jeffrey A. Stone, Esquire

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Review of Investor-Owned Utilities'
Payment Arrangement Programs

Docket No.: 120200-EI
Date: September 19, 2012

REQUEST FOR CONFIDENTIAL CLASSIFICATION

GULF POWER COMPANY ["Gulf Power", "Gulf", or the "Company"], by and through its undersigned attorneys and pursuant to Rule 25-22.006, Florida Administrative Code, hereby files a request that the Florida Public Service Commission enter an order protecting from public disclosure certain information contained in Commission Staff's workpapers generated during an audit of Gulf's customer payment arrangement programs. As grounds for this request, the Company states:

1. On November 17, 2011, Commission Staff initiated a review of the investor-owned utilities' payment arrangement programs (the "Review"). On June 5, 2012, Commission Staff circulated its draft report concerning the Review to Gulf Power. On August 29, 2012, Staff informed Gulf that Staff would be retaining its workpapers relating to the Review and provided Gulf an opportunity to request confidential classification of any confidential business information contained in the workpapers. Gulf has reviewed the workpapers and determined that a portion of the information contained in the workpapers constitutes "proprietary confidential business information" as defined by section 366.093(3), Florida Statutes.

2. Specifically, the workpapers include a summary of Staff's interview of several customer service personnel. The summary includes discussion of Gulf's internal policies and procedures concerning late payment arrangements. Among other things, these procedures outline the maximum timeframes for which payments may be extended, the number of payment arrangements which may be granted to a single customer, the criteria which the Company will

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FPSC-COMMISSION CLERK

use in determining whether late payment arrangements will be made, and disconnect/collection procedures. While Gulf continually works in good faith with all of its customers who are experiencing difficulties paying their bills, the Company must also work to ensure that its payment arrangement process is not abused. Public disclosure of the procedures discussed above would enable customers to abuse or “game” the system, resulting in unnecessary delays in bill payment and increased delinquencies and write-offs. Delinquencies and write-offs adversely affect the financial integrity of the Company and ultimately work to the detriment of Gulf’s general body of customers. Consequently, the subject information is entitled to confidential classification pursuant to section 366.093(3)(e), Florida Statutes. The Commission granted confidential classification for very similar information which was contained in Staff’s draft report. See, Order No. PSC-12-0416-CFO-EI and Document No. 04151-12.

3. Staff’s interview summary also discusses recommendations for process improvements within Gulf’s Interactive Voice Response Unit (“IVRU”). These recommendations are the product of a confidential review of Gulf’s IVRU performed by IVR Doctors –a paid consultant. Public disclosure of this information will provide Gulf’s competitors with access to valuable recommendations for which they have not paid. Gulf’s competitors could, in turn, utilize this information to optimize their own practices at Gulf Power’s expense. Consequently, the subject information is entitled to confidential classification pursuant to section 366.093(3)(e), Florida Statutes.

4. The information filed pursuant to this Request is intended to be, and is treated as, confidential by Gulf Power and, to this attorney’s knowledge, has not been otherwise publicly disclosed.

5. Submitted as Exhibit "A" are copies of the subject documents. The information for which confidential classification is requested is highlighted in yellow. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two (2) edited copies of the subject documents, which may be made available for public review and inspection. Attached as Exhibit "C" to this request is a line-by-line/field-by-field justification for the request for confidential classification.

WHEREFORE, Gulf Power Company respectfully requests that the Commission enter an order protecting the information highlighted on Exhibit "A" from public disclosure as proprietary confidential business information.

Respectfully submitted this 18th day of September, 2012.



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Review Investor-Owned Utilities'
Payment Arrangement Programs

Docket No.: 120200-EI
Date: September 19, 2012

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

Provided to the Commission Clerk under separate cover as confidential information.

EXHIBIT "B"

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FPSC-COMMISSION CLERK

**Bureau of Performance Analysis
Interview Summary**

Company: Gulf Power Company (Gulf) Area: Payment Arrangements Auditor(s): Carpenter, Cordiano	Interview Number: Four File Name: Interview Summary Four Gulf PA Audit.doc
Name: Panel consisting of: Melinda (CSC Manager), Lee (Accountant), Teresa (Customer Account Manager), Shane Boyett (Regulatory Liaison)	Date of Interview: 03-08-12 Location: Pensacola, FL Telephone Number: () -

(1) Purpose of Interview: To gain a further understanding of Gulf's payment arrangement (PA) process.

(2) Interview Summary:

Background:

Duties/responsibilities:

(M) Manager of the Customer Service Center (CSC) in charge of customer service activities associated with the call center (res/bus), energy efficiency matters, and back-office support services for the call center (including tax issues, medical essential services, work flow management, etc.)

(L) Accountant who reports to the customer account manager, (T). (L) procured the data for the tables in response to our document request.

(T) Manager of Customer Accounts who reviews write-offs, collections summaries, special agreements related to charge-offs, and management reports to upper level.

DR1.1: (KC) Can you describe the "Formal Inquiry" and "Warm Transfer" classifications in the Excel spreadsheet in Attachment A?

(M) The formal inquiries are the payment arrangement inquiries that Gulf receives from the PSC.

[(VC) Actually, "informal" inquiries.. Note regarding process: A customer using the PSC website completes the "complaint form" and then chooses to either send it to the PSC or to Gulf. Specific to a payment arrangement situation, the choice to send it to the PSC refers to an inquiry because the PSC call center analyst—upon having real-time correspondence with the customer and explaining that the PSC does not have any rules requiring companies to offer payment arrangements—sends it (the "inquiry" as coded by the PSC) to Gulf for resolution. The warm transfers are the calls where the customer first contacts the PSC and then the call is transferred to Gulf for resolution.]

(M) A Gulf call center analyst has primary responsibility for handling those calls and uses a "cellphone" to do so. [(VC) equipped with a femtocell for better indoor cellular reception?] A secondary "cellphone" is dedicated to that purpose as well and serves as a "safety net" in the rare instance that another analyst has to take care of the calls.

(KC) If a customer contacts multiple times, do these generate a separate line item on the reports?

(M) If a payment arrangement expires, then another count will be added. Otherwise, multiple calls from the same customer regarding the same issue will be rolled into one count.

(CV) Is there a limit as to how many payment arrangements Gulf will grant to a certain customer?

(M) [REDACTED] just a guideline).

(CV) Any written procedures?

(M) Yes, in the Customer Service Standards (also readily accessible to employees via Gulf's intranet).

(VC) Any other ways to ensure performance?

(M) use of the dashboard, monthly reports reviewed by supervisors and local managers, and the charge-off reports.

(CV) How do payment arrangements fit in with write-offs?.. i.e., How do payment arrangements affect write-offs?

(M) can only track write-offs and payment arrangements [separately—(VC) notes that this is consistent with Gulf's response to **DR1.18**, i.e., Gulf's CSS is not equipped to track the charge-off amount for accounts that have previously entered into a short-term PA. The CSS, however, does track long-term PAs ("Special Agreements") that have been charged-off. For the 3-yr review period, SAs made up only 0.75% of total quantity of PAs.]

(T) Reviews charge-off report monthly also reviews deposits report monthly. If a problem is detected, the senior leadership team gets involved.

(CV) Any process changes?

(M) In 2009, the economy was bad, so CSC and Customer Accounts department formed a *Customer Initiatives* list. Examples: Prior to 2009, strict policy on Budget Billing. Then in 2009, *Customer Initiatives* were implemented to relax the budget billing criteria so that payment arrangements could be established easier. For example, Special Agreements allow managers to spread the period to pay. Also, all CSRs to decide whether or not to stretch [redacted] month period. Prior to 2009, CSRs were encouraged not to extend beyond the next month's bill date. In 2009, [redacted] In Jan 2010, implemented: dashboard—reviewed monthly, age of arrears reports—reviewed monthly.

3 In 2009, past-due amounts of [redacted].

(VC) Okay, also in regard to **DR1.3**, Gulf's response states that the requested audio recordings are not available because its system has limited electronic search capability by methods such as customer account and phone number. So:

Because Gulf's recording system and CSS databases have common fields, e.g., the recording system database has an account number field, and the CSS database has an account number field for those with payment arrangements, would Gulf be able to use the "relationship" feature in Access to run a query to capture all of the specific recordings of calls related to, or resulted in, payment arrangements?

(M) Vendor doesn't have that capability.

Okay, and the incoming calls, in particular those involving payment arrangements, are calls that are received by Gulf's Customer Service Center, correct? (M) Yes

And do those involving complaints, in particular those involving payment arrangements, go to a separate Consumer Affairs Department for handling? (M) No, we at the CSC do it all.

Okay, and which types of payment arrangement calls would go to that department?

And does that department audio record all incoming calls?

And are these calls monitored for quality assurance purposes in the same manner as the CSRs in the Customer Service Center?

Any performance related reports generated by this department? If so, by whom and how often?

(VC) In regard to the CSC, how many calls are escalated?

(M) Number of escalated calls is extremely low.

(VC) And where do those calls go.. which department?

(M) to the experienced reps.. (VC) who are they? (M) senior level, medium level reps, then calls can go to the call center supervisors.

(CV) What if the payment arrangement is denied?

(M) Encourage reps to be as transparent as they can—be professional with the customers about the situation, let them know why the payment arrangement was denied and give them other options to pursue by suggesting financial agencies, 211, LIHEAP, EHEAP, etc.

DR1.5 (KC) Can you walk us through the billing collection, cutoff dates chart?

(M) Reading date—(KC) smart meter? One-way or two-way communications? (M) Not sure

Delivery date—when Gulf mails the bill

Due Date—20 calendar days after bill is mailed

After Disconnect Notice—eligible to cut

Give 6 working days (though at least 5 working days pursuant to PSC rule) to pay prior to disconnect

Then disconnect

(VC) i.e., if no payment, no payment arrangement, or payment arrangement breached, the service is disconnected, right? (M) Yes...

(M) 7 days after notice added to collections list—FSRs are not allowed to accept money from customers. FSRs, though, can make a [REDACTED] Accounts on collections list for 5 days; 7 for special circumstances.

As to a payment arrangement, the “behind the scenes” algorithm allows the same opportunity for all.

(KC) What about exceptions?

(T) Yes, e.g., a bank error

(KC) Does CNP on p.B-6 refer to Cut for Non-payment?

(M) Yes

(KC) and “ARMS”.. what does that stand for on p.B-9?

(M) it’s a tool for dispatching orders, e.g., if an order is assigned to a certain truck, the billing system shows the status of the order—used for collections. For payment arrangements, if payment is made, the system would send a note to the FSR’s laptop not to cutoff service.

(KC) and on p.B-13, does “WFM” stand for Work Force Management?

(M) Yes

2 (KC) On p.B-14, is [REDACTED] weeks the maximum extension for payment arrangements?

(M) a collection extension—note that the *Customer Service Initiatives* in place so relaxed this

(KC) Describe the bill extension guidelines on B-15 and B-16.

3 (M) Tools for CSRs to make sound decisions; if customer [REDACTED] CSR thinks twice before disconnecting service or issuing a payment arrangement.

(KC) Describe what “Special Handling” means as shown on B-18.

(M) not normal collection, e.g., medical essential service, rebill summary (e.g., office complex)

(VC) Okay continuing with the policies and procedures questions associated with **DR1.5**:

What are Gulf’s goals and objectives in regard to its payment arrangement process?

(M) CSRs to make firm, good decisions—training reinforces this; share charge-off information with them so they are aware of customer payment (or late or no payment) history to assess financial risk of granting a payment arrangement vs. denying it; monitor performance of CSRs; manage performance; review arrears reports; make changes to payment arrangement process if needed.

(VC) If a customer mentioned he or she could only pay half of the amount owed, how would Gulf handle that situation?

1 (M) Encourage customer to pay [REDACTED]

(VC) Is there a limit as to how many payment arrangements can be granted to a particular customer?

2 (M) [REDACTED]

(VC) And Gulf's response in Attachment B, p.16, states that collection arrangements NEVER are to be made PRIOR to a bill due date because that will result in system problems with printing the total amount due on the collection notice, is that correct?

(M) Yes

(VC) So, if a customer knows he won't be able to pay his bill by the due date and calls to negotiate a payment arrangement prior to his bill becoming past due, will the Gulf be able to assist this customer?

(M) That account wouldn't go into collections until payment is past due. If payment arrangement is issued and extended beyond due date, then that takes it out of collections.

(VC) So, no payment arrangement prior, but Gulf will work with that customer?

(M) Yes, Gulf will work with that customer.

(VC) And is it Gulf's philosophy to work toward identifying potential problems before they become actual problems?

(M) Yes

(VC) And so, like the situation we just discussed, Gulf does what it can to help its customers?

(M) Yes, and the *Customer Initiatives* facilitate this process.

(VC) Okay, what triggers a PA? For example, a customer doesn't have to specifically ask for one to get one, right?

(M) That's right they don't have to specifically ask for one. For example, high bill inquiries could trigger a payment arrangement. CSR would work with the customer and offer options.

(VC) And who are all of the employees (identified by title/department) that handle incoming PA contacts?

(M) The majority are handled by the CSRs at the call center and some get escalated to the CS supervisors.

(VC) Are they all trained to listen for key statements or words from the customer in order to determine whether or not the call is a payment arrangement situation?

(M) Yes

(VC) Would you be able to share some more details on how they go about determining if the main issue at hand is really a payment arrangement issue or if it is something else?

What type of specific training is offered to ensure that they adhere to all of the payment arrangement policies and procedures? And how often is this training?

What training topics are taught? [Some good points related to Building Customer Loyalty—

<http://www.informationweek.com/news/225400016>]

(M) Soft skill part of training is the most important. Training sessions every month. On months that don't have core training, have other types of training such as on rates, smart meters, etc.

(VC) And are Gulf's CSRs and all of its CS employees taught to intently listen to the needs of each caller and to not just place a caller on a payment arrangement unless it is readily apparent that the situation involves the need for a payment arrangement?

(M) Yes

Exhibit 1

(VC) Okay, in regard to **Exhibit 1** which is a part of the stapled set of documents handed out previously:

The first section of the exhibit shows the criteria (in general) used by the CSS algorithm that controls approval

or denial of PAs, correct?

(M) Yes

(VC) And Attachment B-14 and B-15 of Gulf's response explain the details associated with the criteria—and that information is confidential, but would the general criteria listed in this exhibit—or an updated version by Gulf—be something that we could publish in the report?

(S) said he would look at that and work with the legal team.

(VC) Okay, the second section of the exhibit contains highlights associated with how Gulf offers PAs and what types of PAs it offers. Does it correctly show the three **primary** methods of contact for PAs, i.e., the IVRU, the website, and payment arrangements to CSRs?

(M) Yes.. (S) noted one point to add to the exhibit, i.e., if the system denies the payment arrangement, then the customer has the option to speak with a CSR.

(VC) And all three methods are linked to the CSS algorithm for PA approval or denial, correct?

(M) Yes

(VC) As to Gulf's PA offerings, the Single or Multiple Installment PA is a short-term rescheduling of a high bill, e.g., for high usage due to a faulty appliance, is that correct?

(M) Yes, and CSRs can approve a payment arrangement without supervisory approval.

(VC) What's the [REDACTED] Day extended payment arrangement?

(M) That's a normal short-term payment arrangement.

(VC) How about the 35-day payment arrangement? ..for Medical Essential Services?

(M) that's 30 days plus the normal 5 days, which is, yes, a 35-day ext for that

(VC) Are there any other types of payment arrangements?

(M) There are back-billing payment arrangement situations. Those payment arrangements depend on the customer's situation, e.g., cross meters which would be the company's error; therefore, Gulf would set up a Special Payment Arrangement.

(VC) Okay, in regard to the third section of this exhibit, we do have some unanswered questions as to the specific days/events of the timeline, so if you would able to provide us with updated information showing the day or days for each event of the timeline, either now or by way of a **Supplemental Response to DR1.5** later on, that would be great.. We already sent a supplemental out to one of the other companies, so we can proceed in that fashion. What are your thoughts on that? (M) said okay, we can discuss some of the details now and then provide supplemental information later if necessary. (VC) Okay, would you be able to walk us thru the timeline? (M) Sure:

21st day—Meter is read

22nd day—Bill is sent to customer

42nd day—Due date (based on calendar days)

43rd day—Extended Due Date

2 [REDACTED] day—Disconnect Notice (allows customer at least 5 working days prior to disconnect pursuant to rule)

3 [REDACTED] day—Outbound telephone collections (OTC) by the third-party contractor "Televox" is automated and calls are made to all customers listed on the cut list. If the customer's voice mail system is reached, a message is left indicating service will be disconnected if payment in full is not received in a couple of days [(VC) not sure of exact message. so ask Gulf for a supplemental response.]

4 [REDACTED] day—Eligible for disconnection (cut) and placed on the cut list. Order sent to FSR and service is either disconnected for non-payment or maintained in active status because of a good-standing payment arrangement.

5 [REDACTED] day—If no payment, billing system closes account and it goes to Final Bill section (a team of two employees).

(VC) Thanks for the details. I will revise the exhibit and will add this to the supplemental so that you can make changes to it if necessary.

(VC) to formalize **Supplemental DR1.5**—see below:

Please update the attached table so that it correctly reflects the steps taken prior to service disconnection or

(M) Yes, system is programmed to automatically recognize that deposit amount is twice the average bill amount

7) a comparative pre-billing test feature to identify abnormal bills for investigation, correct?

(M) Yes

8) statewide workload sharing to correct workload imbalances?

(M) Yes, and it makes sense to have a group to handle WFM—only have 8 offices to handle total territory, could even put back office personnel (4 employees) on phones if necessary.

(VC) Okay, so the CSS has a number of features that facilitate PA process and one of the most important is the algorithm that uses all of the criteria you shared with us and controls the decision-making process as to whether or not a PA gets approved or denied, correct?

(M) Yes

And, so the algorithm within the CSS is a very important part of the decision-making PA process, and it acts as a predictive control, i.e., it predicts how likely a particular customer would be able to complete a PA, correct?

(M) Yes

(VC) Okay, are there any CSS limitations? If so, please explain. (M) Now that's a loaded question.. do you have an example?

(VC) Oh, sure.. for example, are there any limitations as to who can access and enter payment arrangements into the CSS database? Do certain CSRs such as entry-level CSRs have read-only access to help a customer with only certain issues such as when a bill is due and the amount of the bill—but not allowed to work on actual payment arrangement situations?

(M) There are security level limitations—CSRs certainly have a business need to access; those in other areas like Engineering don't have access.

(VC) And as to limitations associated with the PA process in general:

What about the limits as to how many PAs can be granted for a particular customer? You mentioned earlier that there is [REDACTED] correct? (M) that's correct.

(VC) Are certain employees not allowed to perform long-term payment arrangements but are allowed to work on short-term payment arrangements?

(M) All CSRs have decision-making authority for these.

DR1.7: (VC) Gulf indicates that it provides payment arrangement information to its customers by way of the company website and when contact is made with a CSR. What about Gulf's IVRU, it provides payment arrangement information to customers, too, right? (M) Yes, it does.

(VC) Would you be able to demonstrate the use of the website in making payment arrangements?

(M) I'll have to see if I can arrange that. (VC) Ok, or if it's more convenient to provide screenshots of the website pages that a typical account holder would see when attempting to negotiate a payment arrangement that would work?

(M) Yes we could provide those. (VC) to formalize **Supplemental DR1.7**

(VC) For each year 2009, 2010, and 2011, do you happen to know the percentage of PAs granted for each of the three **primary** methods of contact, i.e., website-initiated, IVRU-initiated, and calls to CSRs? For example, percentages for the following PAs granted (broken down by residential and business):

1) IVRU and website contact resulting in payment arrangements with specified due date(s);

2) CSR contact resulting in payment arrangements involving installments added to the customer's regular monthly bill.

(M) IVRU –33%; website—small (~10%); and for CSRs, it would be the remaining 57%.

other sources of funding. Furthermore, the company notes that this information is provided when customers contact Gulf with a financial hardship. So, would Gulf's CSRs be the only ones that communicate this information? What about by way of Gulf's website, bill inserts, or the IVRU? Any other ways?

(M) thru Project Share twice a year—where customers donate an amount each month and that is sent to the Salvation Army.

(VC) And in line with Gulf's communication of Home Energy Assistance programs to its low-income customers, does Gulf offer any "demand side" programs thru the use of smart grid technologies, such as having a smart meter installed at the premises for load control and dynamic price benefits, to help customers better manage their electric usage to keep bills at affordable levels?. (Refer to Customer Service Conference Agenda at http://www.cec.org/meetings/Meeting%20Documents/2011_CSC_PreliminaryAgenda.pdf)

(M) Yes, thru Energy Select—real-time pricing. This is evolving as tech advances.

(VC) Okay, to proactively promote payment, does Gulf mine its customer data to create predictive models to identify and assist low-income and at-risk customers, such as the elderly, unemployed, military, and disabled? If so, please explain the process and results on how the company reaches out to these customers to facilitate awareness of financial assistance programs such as the LIHEAP and EHEAP.

http://www.cec.org/meetings/Meeting%20Documents/2011_CSC_PreliminaryAgenda.pdf

(M) Don't have specific data in CSS to mine but do provide assistance to customers based on historical data.

DR1.23

(VC) One innovative way to meet the needs of low-income customers, is that Kansas City Missouri Power & Light Co. (as shown on p.4 of this conference agenda) developed a financial assistance program with the Missouri PSC and the Salvation Army whereby a monthly bill credit is offered as financial relief or incentive for customers to continue paying their bill on time. Does Gulf either have a similar program in place or is it perhaps thinking about implementing a similar program? (Refer to

http://www.cec.org/meetings/Meeting%20Documents/2011_CSC_PreliminaryAgenda.pdf)

(M) Yes, Gulf has a partnership with the Salvation Army to provide financial assistance.

DR1.24

(KC) Can you provide the November and December 2011 data?

(M) Yes

DR1.25

(KC) Can you provide the November and December 2011 data?

(M) Yes

Demo of IVRU—performed by Jody (technology expert):

(M) Gulf uses IVR Doctors—an IVR consultant. The doctor provided recommendations to improve Gulf's IVRU. The process improvements cannot be implemented until next year because of a switch issue. One of the recommendations is [REDACTED]

Supplemental DR1.7: Please provide the IVR Doctors' list of recommendations for Gulf's IVRU.

(3) Conclusions:

(4) Date Request(s) Generated:

DR-1 Supplemental

(5) Follow-up Required: See above.

Kevin Carpenter
Project Manager

EXHIBIT "C"

Line-by-Line/Field-by-Field Justification

Line(s)/Field(s)

Interview Summary

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Justification

This information is entitled to confidential classification pursuant to §366.093(3)(e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 2.

This information is entitled to confidential classification pursuant to §366.093(3)(e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 3.