

Dianne M. Triplett DEPUTY GENERAL COUNSEL

April 2, 2024

VIA ELECTRONIC FILING

Mr. Adam J. Teitzman, Commission Clerk Office of Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Re: Docket 20240025-EI, Petition for Rate Increase by Duke Energy Florida, LLC

Dear Mr. Teitzman,

Attached for filing on behalf of Duke Energy Florida, LLC's ("DEF") in the above-referenced docket is the Direct Testimony of Lesley Quick.

Thank you for your assistance in this matter. Please feel free to call me at (727) 820-4692 should you have any questions concerning this filing.

(Document 21 of 40)

Respectfully,

/s/ Dianne M. Triplett

Dianne M. Triplett

DMT/mw

Attachment

CERTIFICATE OF SERVICE Docket No. 20240025-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail this 2nd day of April, 2024, to the following:

/s/ Dianne M. Triplett
Dianne M. Triplett

Jennifer Crawford / Major Thompson / Shaw Stiller Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 JCrawfor@psc.state.fl.us MThompso@psc.state.fl.us SStiller@psc.state.fl.us	Walt Trierweiler / Charles J. Rehwinkel / Mary Wessling / Austin Watrous Office of Public Counsel 111 W. Madison St., Rm 812 Tallahassee, FL 32399 rehwinkel.charles@leg.state.fl.us trierweiler.walt@leg.state.fl.us watrous.austin@leg.state.fl.us wessling.mary@leg.state.fl.us
Jon C. Moyle, Jr. Karen A. Putnal Moyle Law Firm, P.A. 118 North Gadsden Street Tallahassee, Florida 32301 jmoyle@moylelaw.com kputnal@moylelaw.com	Bradley Marshall Jordan Luebkemann Earthjustice 111 S. Martin Luther King Jr. Blvd. Tallahassee, Florida 32301 bmarshall@earthjustice.org jluebkemann@earthjustice.org

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition for Rate Increase by	Docket No. 2024025-EI
Duke Energy Florida, LLC	Submitted for filing: April 2, 2024

DIRECT TESTIMONY

OF

LESLEY G. QUICK

On behalf of Duke Energy Florida, LLC

I. **INTRODUCTION** 1 2 Q. Please state your name and business address. 3 My name is Lesley G. Quick. My business address is 525 South Tryon Street, Charlotte, A. 4 North Carolina 28202. 5 6 Q. By whom are you employed and in what capacity? 7 A. I am Vice President of Customer Advocacy, Regulatory Engagement and Support within 8 Customer Services for Duke Energy Corporation, including Duke Energy Florida ("DEF" 9 or the "Company"). DEF is a subsidiary of Duke Energy Corporation ("Duke Energy"). 10 11 Q. Please describe your educational background and professional experience. 12 I have a bachelor's degree in financial management from Clemson University. I started A. 13 with Duke Energy two weeks after graduation from Clemson in 2002, and I have remained 14 an employee for the past 21 years. Since 2002, I have worked for Duke Energy in a variety 15 of roles, each with increasing responsibility. I have worked in Finance, Rates and 16 Regulatory Compliance, Corporate Strategy, Customer Solutions Products and Services, 17 Revenue Services, and Customer Services. I assumed my current position in Customer 18 Experience and Services in July 2022. 19 20 Q. Please describe your duties and responsibilities as Vice President of Customer 21 Advocacy, Regulatory Engagement and Support within Customer Services.

A. My responsibilities include the oversight, leadership, integration, and implementation of strategic business planning governance, change management, audit and compliance requirements, customer technology support, digital experience transformation, and enhanced customer communications. I provide direction and leadership in the development of organizational business plans to ensure alignment and achievement of objectives, regulatory compliance and reporting, key performance indicators, and operational metrics. Additionally, I lead the Customer Advocacy division. Customer Advocacy is responsible for enhancing support for our customers by expanding outreach with local, state, and federal agency partners to improve access to assistance funding.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to highlight DEF's service to our customers and to describe how we have improved and plan to continue to improve our customer service. I outline some of the steps the Company is taking to continue improving the experience and satisfaction of our customers when they engage with us.

- Q. Do you sponsor or co-sponsor any schedules of the Company's minimum filing requirements?
- A. Yes. I am a co-sponsor supporting the costs and/or investments related to Customer Operations in the following Minimum Filing Requirements ("MFRs"): B-7, B-8, B-9, B-10, B-11, B-13, C-6, C-8, C-9, C-11, C-12, C-15, C-16, C-35, C-36, C-37, C-41, and D-6. They are true and accurate, subject to being updated during the course of this proceeding.

Q.	Do y	you	have	any	other	exhibits	to	your	testimony	?

A. No. I do not have any exhibits to my testimony.

Q. Please summarize your testimony.

A. DEF considers customer service a top priority and works to provide a customer experience that is informed by both customer and employee feedback. As I demonstrate in my testimony, DEF accomplishes this by engaging customers across multiple platforms and offering robust customer care centers with dedicated support for residential and commercial customers across the Company's diverse customer base. My testimony describes the digital enhancements underway that provide customers with more information and options than ever to manage their own account and services, and I elaborate on the ways in which DEF utilizes and tracks customer feedback and survey reporting to tailor customer offerings and continuously improve its support.

II. SUPPORTING OUR CUSTOMERS

Q. How does the Company view customer service?

A. DEF strives to exceed customer expectations by building genuine connections with all customers, soliciting customer feedback, taking note of evolving customer expectations, anticipating customer needs, leveraging emerging technologies, and offering dynamic solutions to customer issues. Providing our customers with the service they need drives our policies, programs, and decisions.

- Q. Please provide an overview of the Company's customer experience and services functions.
- A. DEF's Customer Experience and Services functions are comprised of multiple departments responsible for developing and executing policies, processes, and procedures to successfully engage with our customers across multiple communication channels. The primary channels our customers use to interact with the Company are phone, email, social media (Facebook, Instagram, LinkedIn, and Twitter/X), a mobile application, DEF's website, and face-to-face interactions. Our organization includes customer care operations, large account management, assistance agency support, customer experience, customer technology, metering field services, complaint resolution, billing and payment processes, and credit and collections activities.

Q. Please describe the operation of the customer care centers.

A.

Our customer care operations are designed and continuously enhanced to ensure that customer inquiries are answered promptly and accurately. There are several locations and numerous remote agents that handle inbound and outbound calls, as well as emails, web inquiries, mailed letters, faxes, and social media inquiries. Over 1,200 Duke Energy representatives are available and ready to process and support work in response to Florida customer inquiries. The Company also utilizes vendor call centers to supplement internal Duke Energy customer care specialists.

Customer calls are either processed in our Interactive Voice Response ("IVR") system, allowing customers to self-serve, or by a call center specialist. In 2023, DEF received an

1 average of 634,000 phone calls per month to the IVR system, of which approximately 58% 2 were handled completely within the IVR (i.e., successfully self-served), with the remaining callers speaking with a customer care specialist. 3 4 Does the Company consider the diverse needs of the DEF customer base when 5 Q. 6 providing service? 7 Yes. The Company understands that its customers have diverse service needs and strives A. 8 to recognize and accommodate those diverse needs when possible. For example: 9 Account managers are assigned to our large, complex customer accounts to answer 10 questions, resolve issues, and manage the customer relationship. 11 The Business Service Center ("BSC") is focused on providing a more tailored 12 service model for our SMB customers, customized by business segment. This 13 model allows us to build a virtual account management system to handle requests 14 and ensure customers can leverage all our digital channels for their unique business needs more effectively and efficiently. 15 16 A variety of billing and payment choices are offered to make paying bills simple, 17 secure, and convenient, such as paperless billing, Pick Your Due Date, Fixed Bill, 18 and Budget Billing. 19 An award-winning free mobile app for residential and small business customers 20 allows those customers to easily manage their account from anywhere in the United 21 States. 22 Important information is shared with customers through monthly bill inserts, text, 23 email, or the Company's website.

- Communication and customer service practices are available to address language,
 cultural, and disability barriers.
- Customer care specialists are available to provide 24/7 service for emergency and outage-related requests.

Q. Please describe how DEF's social media program has evolved to keep pace with evolving customer expectations.

A.

With the rise in the use of social media in recent years, DEF has seen an increased number of customers contacting the Company for account-related questions through social media. The Duke Energy enterprise social media channels continue to grow, with more than 730,000 followers on its Facebook, Twitter/X, Instagram, and LinkedIn pages. The Company uses these channels to inform customers about reliability updates in their area and changes that could impact their bills. Further, in an emergency or major storm, social media is used to communicate important information to customers. This allows DEF to make proactive posts providing warnings and safety information to quickly reach as many customers and stakeholders as possible, engage with customers who have storm- or outage-related questions, and monitor how messages are being received and answered. Moreover, the Company has posted updates, including videos detailing storm restoration progress and photos of significant damage to infrastructure, to show customers the scale of repairs underway.

1	III.	TRANSFORMING THE CUSTOMER EXPERIENCE
2	Q.	Is the Company continuing to make digital enhancements to better serve its
3		customers?
4	A.	Yes. The Company makes strategic, value-based investments for the benefit of our
5		customers. Some examples of the benefits to customers are discussed below.
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7	Q.	How is the Company improving interactions with customers?
8	A.	Examples of improved interactions with customers include: the deployment of Customer
9		Connect, enhancements to our IVR system, and online portal enhancements.
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11		Customer Connect
12		The Company implemented a new customer information system platform, Customer
13		Connect, in November 2021. Customer Connect helps the Company deliver a customer
14		experience that simplifies, strengthens, and advances our ability to serve customers. It
15		provides a modern, configurable billing engine and is based on a customer-centric data
16		model that provides a more personalized experience for customers. To that end, customers
17		are now taking advantage of more automated processes and enhanced billing and payment
18		options using new or enhanced self-service capabilities.
19		
20		Interactive Voice Response ("IVR")
21		Since launching the advanced language IVR system in 2019, the Company has learned that
22		customers want the ability to self-serve while navigating seamlessly through the IVR.
23		Existing self-service functionality, such as requesting a payment arrangement and
24		reporting a power outage, was improved via voice activated prompts, helping to provide a

more positive customer experience. From 2021 to 2023, the IVR has increased its containment rate from 54.7% to 58%. This means that a higher percentage of customers that utilized the voice channel were able to self-serve, thus substantiating the effectiveness and efficiency of the IVR's self-service options.

New self-serve options through the IVR include allowing customers to enroll in or withdraw from Budget Billing, securely add their card information for easy access to make a payment, update their phone number, and request their account number. Another added feature is called First-in-Line, which allows customers, during busier-than-normal periods of call volume, to either remain on hold or select a call back number where they can be reached when a service representative becomes available. During 2023, approximately 300,000 DEF customers were offered a call back option through the First-in-Line feature, with over 115,000 accepting the offered call-back thus relieving customers from long wait times.

In addition to the capabilities now available through Customer Connect and the improved IVR, DEF can better connect with customers through texting experiences. Prior to these technology enhancements, the Company was limited to sending web links to static forms that still required manual processing. The new capabilities allow for more dynamic URLs to process requests, thereby reducing the need for manual intervention. For example, when a customer calls into the IVR for a start service request, we can offer to text them a link to the start service page, and if the customer prefers, they can complete their request from their device, allowing them to self-serve. Customers can also receive texts with additional

options and links, such as bill reminders and confirmations, tree trimming information, payment locations, street light repair, and others.

In 2022, DEF enabled another new texting feature, two-way texting, which allows customers to respond to certain messages and reminders. For example, if a bill reminder is sent via text message, and a customer responds indicating that they are unable to pay by the due date, the system can recognize that message and provide relevant options or a link to set up an installment plan. These texting capabilities provide yet another avenue for customers to interact with the Company and to self-serve.

Web Portal

As of December 31, 2023, DEF's live chat functionality within the MyAccount portal has handled approximately 12,000 successful live chat sessions, primarily related to billing and payments. The chat icon is visible to customers during customer service business hours when a specialist is available. Upon identifying their account, the customer will be routed to a specialist. Based on activity seen and positive feedback received during the four-month pilot, the Company made live chat a permanent option for customers in February 2024. In addition, the functionality of live chat was recently enhanced to automatically identify account information based on web login credentials and to include frequently asked questions.

Q. How have the Company's digital enhancements made it easier for customers to report concerns with service outages?

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A.

Outage reporting was enhanced to make it easier for customers to report service interruptions through our website or mobile app. An internet form was launched that allows customers to provide greater detail about their outage, along with an option to enter free form comments to allow for more detail on the situation. The adoption rate of the new outage forms has grown, with the success rate increasing from approximately 55% with the legacy forms to 87% with the new forms. This indicates that more customers are staying on the internet to complete the submission rather than leaving the internet to call in the outage report.

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This increased outage reporting information further allows the Company to digitally collect more detailed data about outage tickets, providing important information to our outage management system. For example, a customer can use the form to report downed wires or loud booms from the area, and our distribution control centers and crews see that detail. This provides more direct information of the immediate situation and field conditions at the scene of the outage.

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The Company continues to proactively communicate with customers experiencing outages, providing updates to customers, via text or email, and up-to-date information on the new outage maps, without a customer having to call. Improvements were also made to the mobile app to ensure key outage data points were more visible to customers during active outages.

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DEF also launched a new Street and Area Light Repair platform on the Company webpage in March 2021. This platform allows both customers and call center specialists to easily report streetlight issues. The tool enables reporting of detail for the exact problem, improving operational efficiencies on repairs. Additionally, customers can select to receive email or text updates on the progress of their requested repair. Chartwell, a company that works with utilities to improve customer experience, satisfaction, and operational efficiency, recently awarded one of its 2022 Best Practices Awards in Outage Restoration to Duke Energy for this tool.

A.

Q. What other efficiencies has the Company gained through digital enhancements?

Other examples of digital transformation efficiencies include the expansion of "Ping It." Ping It is a tool that utilizes Advanced Metering Infrastructure ("AMI") to remotely diagnose customer reported issues. This allows the Company to check the status of a smart meter in lieu of sending a technician to the premises, which is especially useful during major storm event restoration. The elimination of field visits reduces overall costs and allows DEF to focus resources on actual outages and improve overall service. Since 2022, the Company has updated the program to enhance its usage by the Customer Care Operations and Customer Delivery teams. The ability to retrieve information such as voltage data or meter communication status helps troubleshoot customer issues more efficiently. In 2022, the utilization of Ping It enabled DEF to close 23,000 outage tickets without a field visit, saving \$2.4 million through 52.5% fewer field visits. In 2023, DEF avoided over 8,400 outage tickets and closed approximately 17,000 outage tickets without a field visit, thus saving approximately \$2.6 million.

The Ping It program continues to be especially useful during major storms. In fact, during Hurricane Ian in September 2022, Ping It was used approximately 36,000 times to determine a customer's service. In over 6,100 cases, Ping It successfully validated that the customers' service had been returned and closed associated outage tickets, avoiding the need to dispatch technicians. During the most recent storm, Idalia, in September 2023, Ping It was used approximately 36,000 times and resolved more than 2,000 cases without the need to dispatch technicians.

Additionally, the Company has developed the Usage Alert program, which utilizes AMI

technology and data to send customers timely, accurate, and easy to understand usage

information to provide transparency into their estimated electricity costs and help them stay

on budget and in control of their usage. In 2023, Customer Services brought the digital

production and distribution of usage alerts in-house rather than utilizing an outside

vendor's services. This change generates financial savings, creates an enriched usage

experience across platforms, and ultimately provides a more personalized experience to a

larger group of customers. This decision will provide \$1.4 million in net annual savings to

the Duke Energy enterprise and further leverage the functionality of DEF's AMI meters.

Finally, as outlined above and described further below, customer usage of self-service

options continues to increase. Since 2021, DEF call volume has dropped by 21%, while

the number of website and mobile application customer sessions increased 52%.

Q. Please describe how digital enhancements have made it possible for customers to manage their own accounts and service more easily?

A.

The Company's digital enhancements provide customers more information and options than ever to manage their own account and services. For example, Duke's free mobile app allows residential and small business customers to easily manage their account from anywhere in the United States. The app was developed based on customers' most requested features — with it, customers can: view and pay their bill; use the app to manage their profiles; set reminders; schedule automatic payments; enroll in billing and payment programs or view their billing history; report an outage and receive restoration updates; monitor their energy use over time so they can better manage it; and receive personalized offers that help them save. The app uses the same login as the customer's current online account and has an option to use fingerprint or facial recognition for a fast, secure sign-in. The mobile app has been well received by our customers, with user registrations increasing over 200% since the app was originally offered in 2019.

In April 2023, a chatbot feature was added to the mobile app to help customers navigate the site more easily, answer frequently asked questions or navigate to other features outside of the mobile app (e.g., directs customers to the Company's full website for additional information or into the authenticated space for certain account specific features). Since its implementation, approximately 214,000 users have interacted with the chatbot across all Duke Energy utilities. In April 2023, the Company was recognized for the success of the chatbot through winning the gold Chartwell award for the chatbot's functionality.

In addition, in November 2021, Remote Order Fulfillment ("ROF") enabled same day start service through AMI meters in connection with Customer Connect. Customers can request same-day, Saturday, and digital self-service options. This enhancement has increased efficiency in operations and customer satisfaction. Since the enablement, over 309,000 residential customers have requested same-day service, which is approximately 35% of total start service requests. Additionally, a recent enhancement to the IVR system informs calling customers about same-day self-service and can generate a text message to the customer with a direct link to the online form. During 2023, approximately 30% of all DEF start service orders were submitted online through the digital self-service tools. By coupling ROF with remote meter reading capabilities, DEF has been able to redistribute resources to advance other strategic investments.

Our Company applications, updated website, AMI meters, and Customer Information System allow us to offer various programs and products and better communicate with customers. Many of our products and services are available and communicated through multiple digital channels. For example, Pick Your Due Date, which the Company offers through an online web form and through call center enrollment, enables customers to select the billing date that best aligns with their financial situation. Usage alerts, which include current electricity cost and projected costs, are sent via email or text to customers at the midpoint of their billing cycle, and eligible customers are automatically sent payment confirmations via email or text.

Finally, the Company has improved our customer payment confirmation messaging. Customers will now see the dates their payment was posted. If a customer's balance is paid in full, the customer will see a message stating \$0 remaining balance. These messages can provide other account insights to the customer, such as indicating that an account is at risk for disconnection. Also, with the deployment of the new customer information system, a bill reminder message was introduced, which reminds customers three days prior to a bill due date if they had not yet paid. These changes were made to be more informative when communicating with customers who choose to interact digitally with us.

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IV. CUSTOMER SATISFACTION AND COMPLAINT RESOLUTION

Q. How does the Company measure customer satisfaction?

DEF recognizes that customer expectations continuously evolve and that it is critical to hear and understand the "Voice of the Customer" to improve overall customer satisfaction ("CSAT"). To that end, the Company operates a robust CSAT program, which includes both national benchmarking studies and proprietary relationship and transactional CSAT studies. The Company analyzes results from these studies in monthly data review sessions, with findings driving improvements to processes, technology, and behaviors – all to continuously improve the customer experience.

DEF measures overall customer satisfaction and perceptions about the Company through an ecosystem of measurement tools designed to understand what is working well from a customer perspective and to identify opportunities to improve the customer experience. In 2018, the Company launched the CX Monitor, a randomized, census-based survey that measures overall customer sentiment and the ongoing perceptions of the customer

experience. The CX Monitor survey is sent annually via an email with an embedded online survey link to all residential customers; small, and medium business ("SMB") customers; and large business customers for whom we have a valid email address. Customers are asked to give feedback on their overall sentiment and satisfaction with key experiences, such as billing and payment, power quality and reliability, that they have had with us over the past year. Customers can rate overall sentiment and key experience satisfaction on a 0-10 scale and also provide open-ended comments detailing the primary reason(s) for their score.

Since its implementation in 2018, the CX Monitor has collected more than 798,000 residential electric customer surveys and over 8,500 SMB customer surveys for DEF. As of December 2023, DEF has seen an improvement in overall customer sentiment since 2018 as data-driven enhancements continue to improve the customer experience. Further, DEF customers reported some of the highest monthly scores to date during the COVID-19 pandemic, a particularly challenging time that led to significant financial hardship for many of our customers and communities. In response, DEF launched a sweeping series of unprecedented steps to help our customers, including suspending disconnections for nonpayment, suspending late-payment fees and credit card payment fees, offering flexible payment arrangements to customers with past-due balances, and connecting customers to federal funding to help those in need of economic assistance. The Company's ability to pivot and to do so quickly was recognized by our customers and resulted in the highest customer satisfaction ratings the Company has experienced in several years. Customer sentiment remains high today, at or above pre-pandemic levels.

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a 10-point scale).

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Q. How does a customer bring an issue to the Company's attention?

with 65-80% of customers regularly providing the highest satisfaction ratings (9 or 10 on

In addition to our CX Monitor survey, the Company uses "Fastrack 2.0," a proprietary,

post-transaction CSAT measurement program. Fastrack 2.0 measures customer satisfaction

with recent Company interactions. Fastrack 2.0 was intentionally designed to complement

the CX Monitor survey, provide greater insight into experiences that matter to our

customers, and offer near-real time feedback to our front line, customer-facing employees.

The survey questions cover the customer's experience regarding completed field work,

including requests to start and transfer electric service, repair outdoor lights, and restore

outages. Analysis of these ratings helps identify specific service strengths and opportunities

that drive overall satisfaction and provides guidance for the implementation of process and

performance improvement efforts. In the past year alone, DEF has collected more than

33,000 residential and SMB Fastrack 2.0 surveys, with 60-87% of customers regularly

A.

DEF customers have numerous avenues to voice an issue, including through our customer care team, social media platforms or website, email, our employees, or our Ethics line. In addition, as I previously mentioned, CX Monitor and Fastrack are two key proprietary surveys DEF uses on an ongoing basis to track customer feedback. At the end of each survey, customers can provide additional comments regarding any outstanding questions that still need to be answered or issues that still need to be resolved. These comments are converted into high priority "Hot Alerts" and forwarded to the Consumer Affairs team to resolve, and a member of our customer service staff directly contacts the customer to ensure satisfactory resolution to the customer's question or issue. Separately, a Hot Alert may be triggered by an automated key word software review of survey statements, which may indicate customer frustration or a poor experience, even if the customer did not directly ask for follow up.

In addition, customers can raise issues and inquiries directly with our employees. Our employees can then use the "I Can Help" tool to report the concern and immediately begin the process of resolving the issue, as well as track the issue's resolution. Thus, while the Company continues to seek feedback from customers through its various survey instruments, we are also making it easier for customers to proactively contact us, receive follow-up, and resolve issues. Most importantly, the Company is using innovative tools to reduce customer complaints and the need for customers to escalate an issue. At the end of 2023, the average number of complaints per 10,000 customers continued to trend downward since 2019.

V. CHANGING FEE-FREE PAYMENT OPTIONS

- Q. What changes has the Company implemented to the fee-free payment program for residential customers as approved in its previous rate case?
- A. The Company continuously seeks opportunities to lower costs for customers and to meet the growing need for affordable payment options for customers. In 2023, Duke Energy worked with third-party payment processing vendors to amend contract terms to be more favorable to customers. The amended contract will lower the residential transaction fee from \$1.50 to \$1.25 per transaction. This lowered fee is estimated to yield an average savings of approximately \$100,000 per month based on average transaction volume.

Q. Were there other changes to the contract beyond the residential fee noted above?

A. Yes. The amended contract will offer free ACH transactions to non-residential customers who pay their monthly bills via ACH. Based on average transaction volumes, these customers are expected to save \$374,000 annually. Additionally, non-residential credit card transaction fees will be 2.75% of the transaction amount rather than the \$8.50 per transaction currently charged. The Company anticipates that the majority of small business customers paying via card will experience cost savings from this amendment.

Q. Please describe the Company's efforts to support its low-income customers.

A. There are multiple programs and assistance options designed to support our low-income customers. For example, in 2023, DEF connected approximately 46,000 customers with assistance agencies that administer the Low-Income Energy Assistance Program ("LIEAP") and Elderly Home Energy Assistance Program ("EHEAP") and collected

approximately \$27 million in pledges towards customer electricity bills. Additionally, Duke Energy's Share the Light Fund assists customers struggling to pay their energy bills. In 2023, Duke Energy employees, customers and shareholders contributed approximately \$512,000 to the Share the Light Fund, plus a Company match of \$706,000 from the Duke Energy Foundation. Since 2020, Duke Energy and our foundation have funded more than \$27.5 million in charitable giving across the state of Florida. 1

In addition, the Company realized that a more tailored experience was needed to provide more efficient service for those agencies providing customer assistance funding. To streamline and efficiently apply pledges to our customers' accounts, our Centralized Agency Team became the single point of contact for utility assistance agencies. In addition to the Centralized Agency Team, a new digital, self-service portal was developed. The portal provides agencies a confidential and secure way to view customer account details, process agency commitments, and make payments. Agencies can conveniently and more efficiently view pledge history on customer accounts to make more informed pledge decisions and receive notification of pledge expirations to ensure their commitments are satisfied.

VI. CUSTOMER EXPERIENCE AND SERVICES O&M EXPENSE

- Q. Please provide an overview of Customer Experience and Services' O&M expenses.
- A. Customer Experience and Services' O&M expense is driven by several key activities including billing, payment processing, customer care, credit and collections, and various

¹ Charitable giving from the Duke Energy Foundation is not recovered from customers.

field and support activities to serve DEF customers. While there will always be necessary expenses to serve our customers, the Company continually looks for ways to efficiently use resources. For example, the Company has found cost savings related to digital solutions that customers adopt rapidly, such as IVR self-service, Ping-It, usage alerts, and online self-service options. These examples allowed the Company to manage its overall customer service O&M expenses.

- Q. How do the Customer Accounts, Customer Service & Information, and Sales functional areas of O&M expenses for the 2025-2027 test years compare to the Commission's O&M benchmarks (MFR C-41, O&M benchmark variance by function)?
- A. The Customer Accounts (FERC Accounts 901 through 905) 2025 through 2027 Test Year O&M expenses are significantly below the Commission's O&M benchmark thresholds for that functional area, by approximately \$50 million. The Customer Service & Information (FERC Accounts 908 through 910) 2025 Test Year O&M expenses are only \$1 million above the Commission's O&M benchmark threshold in 2025 (due to new and expanded groups that are focused on growth and improving the customer experience) and very slightly over the benchmark for 2026 and 2027. The Sales (FERC Accounts 911-916) 2025 Test Year O&M expenses are slightly above the Commission benchmark thresholds (due to an increase in economic development expense consistent with Rule 25-6.0426, F.A.C.) and below the thresholds for 2026 and 2027.

Q. Are there any specific expense categories that the Company is monitoring?

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Yes. One expense category, Uncollectible Expense, has been trending higher since 2022. The higher account write-off trends are primarily a result of the Company's proactive measures to support our customers when they faced a time of uncertainty during and after the COVID-19 pandemic. Together with other Florida investor-owned electric utilities, DEF temporarily suspended disconnections for several months in 2020. When the Company began to return to more normal billing practices, we continued to provide additional flexibility and assistance needed by many customers, particularly vulnerable populations. When setting payment arrangements, the Company offered terms that included no down payments, extended durations of offers (e.g., up to 6 months), and restructured defaulted agreements without penalty. These customer-focused policy changes gave customers the support they needed to ensure every opportunity to maintain their electric service through an unprecedented time; however, these additional support measures resulted in higher uncollectible expenses in the years following when compared to pre-COVID levels.

In the last 12-18 months, the Company has made several changes to gradually move closer to pre-COVID credit policies to help alleviate the impact to uncollectible expenses. However, the effects of such changes will take time to be fully realized. For example, the Company's standard payment plan offer was reduced in early 2023 to only 2 months, the option to restructure after a default was removed, and customer deposits are now evaluated annually to ensure ample account security is held. The Company will continue to monitor, assess, and adjust credit policies as necessary to balance the needs of all customers.

Finally, in addition to COVID-era customer support impacting the Company's 1 2 uncollectible expenses, increases driven by higher fuel costs (i.e., natural gas) in the past 3 few years spurred higher bills, leading to larger unpaid balances. 4 5

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VII. **CONCLUSION**

- Does this conclude your direct testimony? Q.
- 7 A. Yes.

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