

In the matter of the Market Development )  
Working Group Staff Report ) Case No. 14-2074-EL-EDI

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Develop an operational plan for the purpose of implementing either a statewide seamless move, contract portability, instant connect, or warm transfer process. Once Staff has developed an operational plan, it should then file a Staff Report, with the operational plan...[and] should file this Staff Report not later than one year from the date of this Order.<sup>2</sup>

On July 16, 2015 Staff filed its MDWG Staff Report in this Case.<sup>3</sup> Set forth below are DP&L's comments regarding the MDWG Staff Report.

## **II. RECOMMENDED CHANGES**

As an initial matter, DP&L agrees with the Staff recommendation not to adopt some of the market development options that were discussed in the MDWG meetings; specifically, instant connect, contract portability, and seamless move. As the Staff concedes, the warm transfer process was not discussed in great detail at the MDWG meetings, much less the warm transfer process that is specifically described in the Staff report. Therefore, the Commission should consider allowing the MDWG to further explore the concept of warm transfer before mandating any specific type of process on all of the electric distribution utilities ("EDUs"). Nevertheless, while DP&L is generally supportive of the warm transfer process, the Commission should alternatively consider the following changes to the Staff's recommended warm transfer process.

### **A. Because of the different infrastructures of each EDU, the warm transfer process should be uniquely tailored to each EDU in order to minimize costs and maintain high customer satisfaction.**

The PUCO Staff has recommended a specific warm transfer process that appears to be a "one size fits all" approach using in-house technology and personnel.<sup>4</sup> However, each of the four electric distribution utilities ("EDUs") are uniquely situated to carry out the warm transfer

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<sup>2</sup> Case No. 12-3151-EL-COI, Order at 25 (March 26, 2014).

<sup>3</sup> A Report by the Staff of the Public Utilities Commission of Ohio In the Matter of the Market Development Working Group, at p. 9 (July 16, 2015) ("Staff Report").

<sup>4</sup> Staff Report at 10-12.

process because each EDU's network, telecom system, and call center has different constraints. For that reason, DP&L proposes that the Commission allow each EDU to create its own operational plan to address warm transfer. Specifically, DP&L would like to explore the use of a third party vendor to assist in carrying out the warm transfer process described by the PUCO Staff.

DP&L has concerns about the time and expenses associated with accomplishing the warm transfer process using its current infrastructure and personnel. DP&L's current telecom system will require significant system changes to be able to include a drop-down transfer list of phone numbers for its 40+ suppliers. Moreover, the communications outlined by the Staff as part of the warm transfer process will inevitably necessitate longer phone calls. For instance, Staff recommends that the EDUs: (1) educate customers on available options;<sup>5</sup> (2) if applicable, complete three-way call with CRES provider;<sup>6</sup> and (3) track and retain specific information on warm transfers.<sup>7</sup> Thus, not only will call center personnel be required to address more information, but the length will also likely increase due to customer confusion and additional questioning. The longer phone calls will tie up DP&L representatives so that they are not available to answer calls from other customers. This could lead to a reduction in the ability to handle critical customer calls such as requests to make payments in order to avoid disconnection and reports of outages. DP&L will also need to make changes in process and system in order to track the warm transfer data requested by Staff because DP&L's system does not currently have the functionality to track a call that is specific to a warm transfer. Having each customer service representative track these calls manually and then tallying all calls for 15 months will place an

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<sup>5</sup> Staff Report at 9.

<sup>6</sup> Staff Report at 9.

<sup>7</sup> Staff Report at 11.

even greater burden on the EDU call center. To alleviate all of these concerns, additional representatives and hardware upgrades (additional phone lines and bandwidth) will need to be added, ultimately raising costs to customers for a service that DP&L estimates only approximately 4,800 of its 500,000 customers will be able to utilize annually.<sup>8</sup>

In addition to changes that must be made to the system to accommodate longer calls, requiring DP&L personnel to perform the warm transfer process could jeopardize other customer satisfaction features. For instance DP&L utilizes predetermined, automated after-call surveys in order to ensure customers are receiving customer service that serves their needs. With a warm transfer process, these survey opportunities may be lost causing feedback issues for the customer call center. Furthermore, DP&L is concerned with numbers changing and the accuracy of information it is providing to customers, as well as ensuring the number on file is the appropriate number for customers to speak with the proper supplier representative.

Allowing the EDUs flexibility to accomplish the warm transfer process could reduce expenses and afford additional benefits such as increased customer satisfaction and more robust products. For instance, by switching the warm transfer off to a third party, the EDUs could reduce the amount of time that call center personnel are on the phone and the amount of technological upgrades necessary to accomplish warm transfer. In fact, as Staff pointed out, some EDUs “are currently performing transfers to third parties.”<sup>9</sup> Using these same third party vendors to carry out warm transfers will make for even more effective “one stop shopping for

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<sup>8</sup> With respect to Staff’s cost estimates ranging from \$10,000 to \$210,000, DP&L did not participate in providing supplemental cost and timeline information to Staff because it was unclear as to what the proposed process to accomplish warm transfers would be, therefore, the Company was not in a position to provide such analysis without complete information.

<sup>9</sup> Staff Report at 10.

those customers that wish to be retained as shopping customers.”<sup>10</sup> Affording the EDUs flexibility to address their individual needs will maximize the potential benefits of warm transfer.

**B. The EDUs should be permitted to recover any costs associated with implementing a warm transfer process.**

As explained above, and in a joint document provided by the EDUs to all parties at the MDWG, the warm transfer process requires additional resources, ongoing costs, and several upfront costs to get the proper functionality in place irrespective of whether it is done in-house or with a third party vendor.<sup>11</sup> Many of these costs are associated with system changes that will be individually tailored to each utility’s current telecom infrastructure in order to transfer to all suppliers and track specific data. Moreover, several operational details must be addressed before implementing Staff’s recommended warm transfer process. In fact, the warm transfer proposal might not necessarily “be the easiest and least expensive option to implement.”<sup>12</sup> Thus, while DP&L will make efforts to minimize the costs, the EDUs must be made whole for any costs that are incurred while implementing this additional procedure to benefit CRES providers.

**C. The EDUs should have the ability to seek waivers necessary to implement the warm transfer process.**

As Staff explained, it currently appears as though the warm transfer process “do[es] not require rule changes/waivers.”<sup>13</sup> Given the different postures of each EDU and the different ways in which warm transfer may be implemented by each of the EDUs, the PUCO should reserve the utilities’ ability to seek any necessary waivers of administrative code provisions.

### **III. CONCLUSION**

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<sup>10</sup> Staff Report at 11.

<sup>11</sup> As previously mentioned, under DP&L’s current infrastructure, it would be less costly to make use of a third party vendor and those costs could be netted out against any potential revenue received from a third party vendor.

<sup>12</sup> Staff Report at 10.

<sup>13</sup> Staff Report at 11.

As always, DP&L appreciates the opportunity to provide comments in connection with this Case, and urges the Commission to adopt DP&L's proposal that each EDU create its own operational plan regarding compliance with continued service with a supplier during a move within the same service territory and that those operational plans may include the use of a third-party vendor for the handling of such calls based on the above arguments.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that these comments were filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 6th day of January 2016. The PUCO's e-filing system will electronically serve notice of the filing of this document on all parties of record.

/s/ Judi L. Sobecki

Counsel for the Dayton Power and Light Company

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Summary: Comments of The Dayton Power and Light Company regarding the Public Utilities Commission of Ohio's Staff Report in the matter of the Market Development Working Group electronically filed by Mr. Tyler A. Teuscher on behalf of The Dayton Power and Light Company