GOVERNMENT OF PUERTO RICO
PUERTO RICO PUBLIC SERVICE REGULATORY BOARD
PUERTO RICO ENERGY BUREAU

IN RE: PERFORMANCE METRICS
TARGETS FOR LUMA ENERGY SERVCO,
LLC

CASE NO. NEPR-AP-2020-0025

SUBJECT: Motion Requesting Witness Jessica Laird To Be Included As Witness for the Major Outage Events Category

MOTION REQUESTING WITNESS JESSICA LAIRD TO BE INCLUDED AS WITNESS FOR THE MAJOR OUTAGE EVENTS CATEGORY

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME now **LUMA Energy, LLC** ("ManagementCo"), and **LUMA Energy ServCo, LLC** ("ServCo"), (jointly referred to as the "Operator" or "LUMA"), and respectfully state and request the following:

1.   On August 18, 2021, LUMA filed a *Motion Submitting Pre-Filed Testimonies*. Therein, LUMA included the pre-filed direct testimony of Mrs. Jessica Laird. Among the topics covered by Mrs. Laird's direct testimony was the Major Outage Events-Communications Metrics. *See* Exhibit 1, lines 56-62. Then, Mrs. Laird proceeded to describe the Major Outage Events-Communications Metrics and explain how said metric was selected. *Id.* lines 204-216.

2.   On February 1, 2023, the Energy Bureau issued a Resolution setting the Evidentiary Hearing Agenda scheduled for February 7-10, 2023. The Evidentiary Hearing Agenda was included as Attachment A to the Resolution. The Energy Bureau divided the hearing days into various performance metrics categories. The "Major Outage Events" category was scheduled to be discussed on Friday, February 10, 2023. The witnesses listed for that category were: Terry Tonsi, Abner Gómez, Don Cortez, and Mario Hurtado for LUMA; Gerardo Cosme for the

Independent Consumer Protection Office and Agustín Irizarry-Rivera for the Local Environmental and Civil Organizations.[1] Mrs. Laird was not included as a witness, even though she offered direct testimony on the category of Major Outage Events almost 15 months ago.

3.   In view of the above, LUMA hereby requests the Energy Bureau to include Mrs. Laird as a witness for the "Major Outage Events" category on Friday, February 10, 2023.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **includes** Mrs. Jessica Laird as a witness for the Major Outage Events category set for discussion on Friday, February 10, 2023.

RESPECTFULLY SUBMITTED.

We hereby certify that we filed this motion using the electronic filing system of this Energy Bureau. We will send an electronic copy of this motion to attorneys for PREPA, Joannely Marrero-Cruz, jmarrero@diazvaz.law; and Katiuska Bolaños-Lugo, kbolanos@diazvaz.law, the Office of the Independent Consumer Protection Office, Hannia Rivera Diaz, hrivera@jrsp.pr.gov, and counsel for the Puerto Rico Institute for Competitiveness and Sustainable Economy ("ICSE"), Fernando Agrait, agraitfe@agraitlawpr.com, counsel for the Colegio de Ingenieros y a de Puerto Rico ("CIAPR"), Rhonda Castillo, rhoncat@netscape.net, and counsels for Comité Diálogo Ambiental, Inc., El Puente de Williamsburg, Inc., Enlace Latino de Acción Climatica, Alianza Comunitaria Ambientalista del Sureste, Inc., Coalicion de Organizaciones Anti-Incineración, Inc., Amigos del Río Guaynabo, Inc., CAMBIO, Sierra Club and its Puerto Rico Chapter, and Unión de Trabajadores de la Industria Eléctrica y Riego (jointly, Puerto Rico Local and Environmental Organizations), larroyo@earthjustice.org, rstgo2@gmail.com, notificaciones@bufete-emmanuelli.com, pedrosaade5@gmail.com., jessica@bufete-emmanuelli.com; rolando@bufete-emmanuelli.com, lvelez@earthjustice.org, rmurthy@earthjustice.org, jcassel@earthjustice.org.

In San Juan, Puerto Rico, this 2nd day of February 2023.

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[1] On February 1, 2023, LUMA filed a *Motion for Reconsideration of the Resolution of February 1, 2023*, objecting to the inclusion of Mr. Irizarry-Rivera as a witness for the Major Outage Events category.

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Exhibit 1

GOVERNMENT OF PUERTO RICO
PUERTO RICO PUBLIC SERVICE REGULATORY BOARD
PUERTO RICO ENERGY BUREAU

IN RE:	CASE NO.: NEPR-AP-2020-0025
PERFORMANCE TARGETS FOR LUMA ENERGY SERVCO, LLC	

Direct Testimony of
Mrs. Jessica Laird
Vice President of Customer Experience, LUMA Energy ServCo LLC
August 3, 2021

1	Q.	**Please state your name.**
2	A.	My name is Jessica Laird.
3	Q.	**Please state business mailing address, title, and employer.**
4	A.	My business mailing address is PO Box 363508 San Juan, Puerto Rico 00936-3508. I am
5		the Vice President, in the Customer Experience Department for LUMA Energy.
6	Q.	**On whose behalf are you testifying before the Puerto Rico Energy Bureau (the**
7		**"Energy Bureau").**
8	A.	My testimony is on behalf of the LUMA as part of the Commonwealth of Puerto Rico
9		Public Service Regulatory Aboard Puerto Rico Energy Bureau (Energy Bureau)
10		proceeding NEPR-AP-2020-0025, the Performance Targets for LUMA Energy ServCo,
11		LLC.
12	Q.	**Are there any exhibits attached to your testimony?**
13	A.	Yes, there are 4 exhibits attached to my testimony:
14		a. Exhibit A: Motion for Partial Reconsideration of Resolution and Order of April 8 2021,
15		submitted April 28, 2021 in Docket NEPR-MI-2019-0007.
16		b. Exhibit B: JD Power Survey Results for PREPA, conducted in Q4 of 2020 and Q1 of
17		2021.
18		c. Exhibit C: JD Power Targets Table 2-4 and 2-5 as provided in LUMA's Performance
19		Metrics Targets Revised Filing of August 18, 2021.
20		d. Exhibit D: Performance Metrics Workpapers – Contact Center Metric Baselines tab.
21	Q.	**What is your educational background?**
22	A.	I hold a Bachelor of Commerce with Distinction from the University of Alberta.
23	Q.	**What is your professional experience?**

24	A.	I have approximately 20 years of professional experience in Customer Experience,
25		Regulatory, and Retail Services within the electric utility industry. In 2019, I joined
26		LUMA's Customer Experience department as a Director in the Customer Experience
27		Division.
28	Q.	**Please describe your work experience prior to joining LUMA?**
29	A.	I have worked for more than 20 years in the Canadian utility industry largely in customer
30		service roles. I have worked in both regulated and deregulated utilities on both the
31		Transmission and Distribution and retail sides of the utility industry. Prior to joining
32		LUMA my most recent role at ATCO was setting up and operating ATCO Energy, ATCO's
33		energy retail arm as Sr. Manager, Home & Energy Retail Operations. My experience
34		includes operating contact centers, voice of the customer programs, back office and billing
35		operations, credit and collections operations, regulatory committees, customer self-serve
36		tools and online retail sales. I have significant experience in customer experience
37		improvement, process development and improvement, contract governance, and
38		operational analytics and Key Performance Indicator reporting.
39	Q.	**Do you hold any professional licenses, if so, which?**
40	A.	No
41	Q.	**Have you previously testified or made presentations before the Energy Bureau?**
42	A.	Yes - I have testified before the Energy Bureau in the 4 proceeding as follows:
43		a. NEPR-MI-2021-0004 – LUMA's Initial Budgets
44		b. NEPR-MI-2020-0019 – Review of Puerto Rico Electric Power Authority's System
45		Remediation Plan,
46		c. NEPR-MI-2019-0007 – The Performance of the Puerto Rico Power Authority, and

47   d. NEPR-MI-2021-0008 – Review of LUMA Model Bill.

48 **Q. Which documents did you consider for your testimony?**

49 A. I considered the following documents:

50   a. Original Performance Metrics Filing filed in Docket NEPR-AP-2020-0025 submitted

51   on February 25, 2021,

52   b. Revised Performance Metrics Filing Docket NEPR-AP-2020-0025 to be filed on

53   August 18, 2021,

54   c. PREB Resolution and Order issued May 21, 2021 in NEPR-MI-2019-0007, and

55   d. J.D. Power Survey (See Exhibit B)

56 **Q. What is the subject and purpose of your Direct Testimony?**

57 A. My testimony is in support of LUMA's Performance Metrics Targets on metrics related to

58 Customer Satisfaction.

59   a. Residential and Commercial Customer Satisfaction

60   b. Average Speed of Answer

61   c. Abandonment Rate

62   d. Major Outage Events – Communication Metrics

63 **Q. Please describe the methodology for Residential and Commercial Customer**

64 **Satisfaction.**

65 A. J.D. Power Electric Utility Residential Customer Satisfaction Study$_{SM}$ provides the electric

66 industry with important insights into the evolving needs and demands of residential and

67 commercial electric utility customers. The J.D. Power survey is a standard methodology.

68 The customer information was taken from the PREPA Oracle CC&B system and used by

69   J.D. Power to survey a statistically significant sample size via email (residential n=4008;

70   commercial n=163).

71   To measure customer satisfaction, critical experience factors are examined using an index

72   model. The study measures overall customer satisfaction of residential and commercial

73   customers based on performance in six factors and three sub-factors:

74   **Power Quality & Reliability**; **Price**; **Billing & Payment**; **Corporate Citizenship**;

75   **Communications**; and **Customer Care**.

76   For the residential survey, the following three sub-factors were examined within **Customer**

77   **Care: Phone**; **Digital**; and **In-Person**.

78   The key objectives of this study are to:

79   - Quantify the factors that drive overall satisfaction among residential customers

80   - Analyze the relative performance of the major electric utility companies in the United

81   States in terms of how well they satisfy their residential customers

82   - Capture a nationwide footprint of electric utility performance by including as many utilities

83   as possible

84   - Provide actionable information by developing insights about the needs of electric

85   consumers

86 **Q.** **How was the data used to calculate the baseline for JD Power Residential and**

87   **Commercial Customer Satisfaction metrics?**

88 **A.** The data was used at face value as the survey is standardized. There is no previous data

89   from the Puerto Rico Electric Power Authority of the Puerto Rico Energy Bureau to

90   compare.

91 **Q.** **What considerations were made upon analyzing the baseline data to determine the**

92   **target for the JD Power Customer Satisfaction metrics?**

93	A.	PREPA had never previously measured Customer Satisfaction (CSAT), therefore, a
94		baseline had to be set during the front-end transition period. J.D. Power was able to
95		complete 2 quarters of residential survey results and 1 half of business survey results within
96		the front-end transition period. Given the strong response to both surveys, LUMA was able
97		to use the results to set the CSAT baseline.

98 **Q.** **What are your recommendations on the JD Power Residential and Commercial**
99 **Customer Satisfaction metric?**

100 A. As explained in section 4.2 of the LUMA's Performance Metric Target Revised Filing,

101 Customer Satisfaction rankings have become a standard method for energy regulators to

102 measure utility performance within the electric utility market over the last 10 years. J.D.

103 Power performs standardized Customer Satisfaction surveys for many electric utilities in

104 North America. When compared to the other utilities participating in the J.D. Power

105 Electric Utility Customer Satisfaction Survey, PREPA was ranked by its customers as the

106 worst performing utility. Other operational indicators such as reliability metrics, price, wait

107 times, and billing accuracy indicate that PREPA was not performing at the same level as

108 it's comparable utilities therefore the poor CSAT results are indicative of performance. I

109 recommend the J.D. Power CSAT results gathered during front end transition be taken at

110 face value and used to set the baseline.

111 The target CSAT number (See Exhibit C) were developed based on the following:

112 • A review of the LIPA CSAT numbers after the LIPA agreement was implemented

113 showed a slow improvement over time of the scores in the J.D. Power survey. It is

114 important to note that the LIPA utility was in significantly better condition than the

115 PREPA utility.

116   •   The CSAT scores broken out by category show that of the 6 categories in the CSAT

117   survey, Price and Quality & Reliability are 2 of the lowest scores and both will take

118   time to create significant improvements.

119   **Q.**   **Please describe the Average Speed of Answer Performance Metric.**

120   A.   It consists of the average wait time from the moment the customer enters the Automated

121   Call Distribution (ACD) queue to the time the call is answered by an agent.

122   **Q.**   **What data analysis, if any, was examined to develop the Average Speed of Answer**

123   **Performance Metric?**

124   A.   We reviewed the Average Speed of Answer data from the three separate contact center

125   platforms (PREPA, Insight & Telecontacto). PREPA's data is extracted from their Avaya

126   contact center platform. Please see Appendix B for sample of the reports used. We review

127   this data daily, weekly, and monthly.

128   Upon analysis of the data provided for the three separate contact centers, it was discovered

129   that the third-party vendors were not reporting the total time in queue as calls were routed

130   to sit in the PREPA contact center queue for ten minutes prior to rolling over into the third-

131   party contact center queues. The time reported by the third parties included only the amount

132   of time spent in their queue (ex. if a customer waited ten minutes in the PREPA queue and

133   then two minutes in the Telecontacto queue their ASA should be twelve minutes, however,

134   the reports showed only two minutes). Due to the discrepancy in data and the siloed

135   reporting, the baseline was set based on the PREPA contact center data and subject matter

136   experience.

137   After June 1st, 2021, it was discovered that PREPA's call center (and subsequently the

138   third-party service providers) provided a limited number (500) of trunks for calls received

139		at their call center. This essentially means that once all trunks were full, customers would
140		receive a busy signal and not get through to the Interactive Voice Response (IVR).
141		Effectively, in any given day, there was a cap on the total number of calls PREPA could
142		receive. As of June 1st, 2021, LUMA has transitioned to a cloud-based call center platform
143		which has removed that limitation, in effect drastically increasing the number of calls
144		received daily.
145	Q.	**Describe the methodology to calculate the baseline for Average Speed of Answer**
146		**Performance Metric.**
147	A.	It considers the Total Automatic Call Distributor (ACD) wait seconds / total answered
148		calls. An ACD is a telephony system that automatically distributes incoming phone calls
149		to available agents, based on data entered by the caller into an Interactive Voice Response
150		(IVR) and skills-based routing, using skills associated with agents.
151		LUMA's baseline data derives from FY2019 – March 2020. When assessing whether to
152		use FY2019 or FY2020 data, we determined that the FY2020 does not support a reliable
153		baseline because current data is only available for a period of 6 month, reported ASA varies
154		significantly from month to month due to COVID and onboarding new outsource vendors,
155		and there is a lack of visibility into three separate call routing systems and overflow which
156		prevents LUMA from accurately calculating baseline ASA.
157	Q.	**How did LUMA determine the targets for Average Speed of Answer?**
158	A.	Starting with the baseline, LUMA calculated a reasonable year over year improvement that
159		accounted for hiring, learning curve, training, ramp up, turn over, process improvement
160		and other standard operational changes. LUMA will not be suggesting a change to the
161		targets even with the discovery of the limiting trunks prior to June 1st, 2021. The proposed

162   targets are set in Table 2-6 of LUMA's Revised Performance Metrics Targets filing, and is

163   9.0 for Year 1, 6.4 for Year 2 and 5.8 for Year 3.

164   **Q.**   **What actions will be taken to achieve performance metric targets for Average Speed**

165   **of Answer?**

166   A.   Per Section 3 of the LUMA's Performance Metrics Targets Revised Filing, LUMA plans

167   to achieve ASA targets by developing a robust call forecast model, staffing to meet forecast

168   requirements and making full use of the implemented cloud-based contact center

169   technology.

170   **Q.**   **Please describe the methodology for the Abandonment Rate Performance Metric.**

171   A.   The abandonment rate calculation is an industry standard calculation. Abandonment Rate

172   is equal to calls offered minus calls answered divided by call offered times 100.

173   **Q.**   **What data analysis, if any, did you examine to develop the baseline for the**

174   **Abandonment Rate Performance Metric?**

175   A.   LUMA reviewed the Abandonment Rate data from the three separate contact center

176   platforms (PREPA, Insight & Telecontacto). LUMA also reviewed industry standard

177   abandonment rates across utility contact centers.

178   LUMA's baseline was calculated using FY2019 to March 2020 data. Upon further analysis,

179   LUMA determined that using FY2020 data would not support a reliable baseline due to the

180   facts that the current data is only available for a period of 6 months, reported abandonment

181   varies significantly from month to month due to COVID and onboarding new outsource

182   vendors, and there is a lack of visibility into three separate call routing systems and

183   overflow presents us from accurately calculating baseline abandonment.

184   **Q.**   **How was the data used to calculate the baseline for the Abandonment Rate**

185		Performance Metric?
186	A.	Due to the siloed approach to data collection between the three PREPA contact centers,
187		LUMA set the baseline using the PREPA contact center data and based on subject matter
188		experience and the significantly under industry standard results. As a result, LUMA
189		reduced the abandonment rate by 2% to achieve an immediate improvement.
190	Q.	How did LUMA determine the target for Abandonment Rate?
191	A.	Starting with the baseline, LUMA calculated a reasonable year over year improvement that
192		accounted for hiring, learning curve, training, ramp up, turn over, process improvement
193		and other standard operational changes. LUMA will not be suggesting a change to the
194		targets even with the discovery of the limiting trunks prior to June 1st. The proposed
195		targets are set in Table 2-8 of LUMA's Revised Performance Metrics Targets filing, and is
196		40% for Year 1, 32% for Year 2 and 29% for Year 3.
197	Q.	What actions will be taken to achieve performance metric targets for Abandonment
198		Rate?
199	A.	Per Section 3 of the Revised Filing, LUMA plans to achieve abandonment rate by
200		developing a new workforce management team to use a workforce management system
201		ensuring staffing levels are accurate in order to reduce abandoned calls. This team will
202		follow standard industry practices to forecast call volumes and peaks and staff
203		appropriately improving overall performance and meeting call volume demands.
204	Q.	How did LUMA select the Major Outage Events: Communication metrics?
205	A.	In the event of a major outage, LUMA's responsibility is to be transparent with our
206		customers and provide clear streams of communication in emergency situations. Our
207		emergency response team has agreed that the following metrics are an accurate

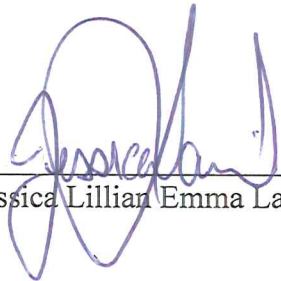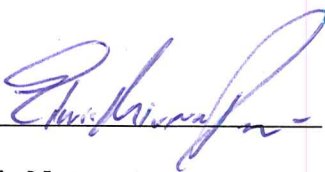| 208 | | representation of how LUMA should be measured in major outage events. These metrics |
209		include: Call Answer Rates, Web Availability, PREB & P3A Reporting, Customer
210		Communications and Outgoing Message on Telephone Line are essential.
211	Q.	**Describe the Communications Major Outage Event Performance Metric.**
212	A.	It assesses the utility's ability to receive and to disseminate information about the outage
213		event and about the recovery process. It considers web availability, PREB and
214		Administrator (P3A) Reporting, customer Communications and outgoing message on
215		telephone line. The descriptions are found in Tables 2-24 and 2-25 of LUMA's
216		Performance Metrics Targets Revised filing.
217	Q.	**What are your recommendations on the Customer Service Performance Metrics?**
218	A.	I recommend that the Puerto Rico Energy Bureau approve the Customer Service
219		Performance Metrics on Residential and Commercial Customer Satisfaction, Average
220		Speed of Answer, Abandonment Rate, and Major Outage Events – Communication Metrics
221		as proposed in LUMA's Performance Metrics Targets Revised Filing.
222	Q.	**Does this complete your testimony?**
223	A.	Yes.

ATTESTATION

Affiant, Mrs. Jessica Lillian Emma Laird, being first duly sworn, states the following: The prepared Direct Testimony constitutes my direct testimony in the above-styled case before the Puerto Rico Energy Bureau. Affiant states that she would give the answers set forth in the Direct Testimony if asked the questions that are included in the Direct Testimony. Affiant further states that, facts and statements provided herein is her direct testimony and to the best of her knowledge are true and correct.

_____
Jessica Lillian Emma Laird

Affidavit No. -8,433-

Acknowledged and subscribed before me by Ms. Jessica Lillian Emma Laird, whose full name is as expressed herein, of legal age, married, business executive, and resident of San Juan, Puerto Rico, in her capacity as Vice President of Customer Experience of LUMA Energy, LLC, who is personally known to me.

_____
Public Notary

Direct Testimony

Exhibit A

Motion for Partial Reconsideration of Resolution and Order of April 8. 2021, submitted April 28,

2021 in Docket NEPR-MI-2019-0007.

JD Power Survey Results for PREPA

Summary:

Residential Q4 2020: 395

- Price → 276
- Corporate Citizenship → 279
- Quality & Reliability → 323
- Communication → 330
- Customer Care → 600
- Billing & Payment → 652

Residential Q1 2021: 405

- Price → 275
- Corporate Citizenship → 285
- Quality & Reliability → 339
- Communication →353
- Customer Care → 607
- Billing & Payment → 637

Commercial Wave 2 2020: 345
- Price →226
- Corporate Citizenship → 239
- Quality & Reliability → 293
- Communication →250
- Customer Care → 535
- Billing & Payment → 597

Table 2-4. J.D. Power Customer Satisfaction Survey (Residential Customers)

	Target Threshold	Minimum Performance Level	150%	125%	100%	50%	25%
PREB Order	N/A						
Baseline	398						
Year 1	427	398	450	439	427	415	405
Year 2	455	427	480	468	455	440	430
Year 3	484	455	500	492	484	470	460

Table 2-5. J.D. Power Customer Satisfaction Survey (Business Customers)

	Target Threshold	Minimum Performance Level	150%	125%	100%	50%	25%
PREB Order	N/A						
Baseline	345						
Year 1	380	345	415	400	380	370	355
Year 2	414	380	450	432	414	400	390
Year 3	449	414	475	462	449	435	425

Exhibit D

Performance Metrics Workpapers – Contact Center Metric Baselines tab.

See excel workbook

Contact Center Metric Baselines

Average Speed of Answer

Metric Schedule							
	Target Threshold (min)	Minimum Performance Level	150%	125%	100%	50%	25%
Baseline	10						
Year 1	9	9.7	4.5	6.8	9	9.3	9.6
Year 2	6.4	7.1	3.2	4.8	6.4	6.7	7
Year 3	5.8	6.4	2.9	4.4	5.8	6.1	6.3

Abandon Rate

Metric Schedule							
	Target Threshold (min)	Minimum Performance Level	150%	125%	100%	50%	25%
Baseline	50.00%						
Year 1	40.00%	45.00%	20.00%	30.00%	40.00%	41.00%	42.00%
Year 2	32.00%	35.00%	16.00%	24.00%	32.00%	33.00%	34.00%
Year 3	29.00%	34.00%	14.50%	22.00%	29.00%	31.00%	33.00%

Customer PREB Complaint Rate

Metric Schedule							
	Target Threshold (min)	Minimum Performance Level	150%	125%	100%	50%	25%
Baseline	11.10%						
Year 1	10.80%	11.55%	10.30%	10.55%	10.80%	11.05%	11.30%
Year 2	10.60%	11.35%	10.10%	10.35%	10.60%	10.85%	11.10%
Year 3	10.10%	10.85%	9.60%	9.85%	10.10%	10.35%	10.60%