

ORIGINAL

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

**IN THE MATTER OF THE COMMISSION'S)
INVESTIGATION INTO THE BOARD OF)
DIRECTORS FOR UTILITIES OF THE)
DEPARTMENT OF PUBLIC UTILITIES FOR)
THE CITY OF INDIANAPOLIS D/B/A)
CITIZENS ENERGY GROUP AND CWA)
AUTHORITY, INC., INCLUDING THE)
BILLING PRACTICES AND COMPLIANCE)
WITH APPROVED RULES AND)
REGULATIONS.)**

CAUSE NO. 44462

APPROVED: MAR 04 2015

ORDER OF THE COMMISSION

**Presiding Officers:
Carolene Mays-Medley, Vice Chair
Aaron A. Schmoll, Senior Administrative Law Judge**

On March 19, 2014, the Commission commenced an investigation of the Board of Directors for Utilities of the Department of Public Utilities for the City of Indianapolis d/b/a/ Citizens Energy Group and CWA Authority, Inc. (jointly "Citizens"), including billing practices relating to Citizens' gas, water, and wastewater utilities and compliance with approved rules and regulations.

On April 17, 2014, the Commission issued a preliminary issues list for consideration by the parties to this Cause. The preliminary issues list covered the following topics: (A) Call Center Data and Customer Payment Designations, (B) Billing Issues, (C) Payment Application Errors, (D) Meter Reading and Estimation, (E) Water/Sewer, (F) Customer Service and Compensation Metrics, (G) Application of Low Income Home Energy Assistance Program ("LIHEAP") and Universal Service Program ("USP") Funds, and (H) UtilityShield.

The Commission held a prehearing conference in this Cause on April 22, 2014 at 11:00 a.m. in Room 224 of the PNC Center, 101 W. Washington St., Indianapolis, IN. At the prehearing conference, procedural matters were mutually agreed to by Citizens and the Indiana Office of Utility Consumer Counselor ("OUCC"). On April 23, 2014, the Commission issued a prehearing conference order memorializing the matters agreed upon at the prehearing conference.

On June 12, 2014, the Commission issued its final issues list for this investigation proceeding. In addition to the topics included on the preliminary issues list, the final issues list included an additional topic – (I) Background Information.

On September 17, 2014, the Commission issued a Docket Entry (“September 17 Docket Entry”) directing Citizens to respond to a number of issues. On September 19, 24, and 25, 2014, Citizens submitted responses to the September 17 Docket Entry.

The Commission conducted a public evidentiary hearing on September 26, 2014, at 9:00 a.m. in Room 222 of the PNC Center, 101 W. Washington St., Indianapolis, Indiana. Citizens and the OUCC were represented by counsel at the hearing. The prefiled testimony and exhibits of Citizens and the OUCC were admitted into evidence without objection, and Citizens and the OUCC waived cross-examination of each other’s witnesses. The Commission questioned several of Citizens’ witnesses at the evidentiary hearing.

Based on the applicable law and being duly advised, the Commission finds as follows:

1. Notice and Jurisdiction. Due, legal, and timely notice of the public hearing conducted by the Commission herein was given and published as required by law. Citizens is subject to the jurisdiction of the Commission in the manner and to the extent provided by the laws of the State of Indiana, including Ind. Code § 8-1-11.1-3 and certain provisions of the Public Service Commission Act, as amended. Pursuant to Ind. Code §§ 8-1-2-68 and -69, the Commission has jurisdiction to commence investigations of rates and charges and service-related issues. Therefore, the Commission has jurisdiction over Citizens and the subject matter of this proceeding.

2. Citizens’ Case-in-Chief Evidence. Citizens presented testimony and exhibits sponsored by: (a) Carey B. Lykins, President and CEO of Citizens; (b) Michael D. Strohl, Senior Vice President and Chief Customer Officer for Citizens; (c) Rhonda L. Harper, Director of Customer Service for Citizens; (d) Leon D. Broughton, Director of Billing and Revenue Assurance for Citizens; (e) Curtis H. Popp, Vice President of Customer Operations for Citizens; (f) David J. Wathen, a consultant employed by Towers Watson, a global professional services company offering solutions in the areas of employee benefits, talent management, rewards, and risk and capital management; and (g) Jodi L. Whitney, Vice President, Human Resources for Citizens.

A. Testimony of Carey B. Lykins. Mr. Lykins explained Citizens’ approach to this investigation and emphasized that Citizens hopes to achieve continued improvement to customer service through this investigation process. Mr. Lykins also discussed the process of integrating the City of Indianapolis’ water and wastewater utilities into Citizens’ operations, and the challenges presented by this integration. He described certain initiatives Citizens has undertaken to improve customer service, such as the creation of a Shared Field Services (“SFS”) department, certain organizational changes, and the launch of the Voice of the Customer initiative. He also described Citizens and its utility operations, including the history of Citizens’ utilities, and the nature and purposes of Citizens’ trusts.

Mr. Lykins addressed five questions from the Commission’s final issues list, relating to (I) Background Information and (F) Customer Service and Compensation Metrics. First, Mr. Lykins explained that Citizens has traditional utility obligations to both the City of Indianapolis/Marion County customers and customers outside of Marion County, which included the obligation to provide utility service at a reasonable cost. However, in addition to these

traditional utility obligations, Citizens Energy Group owes a special trustee obligation to City of Indianapolis/Marion County residents, to confer benefit on such inhabitants. CWA Authority, Inc., which owns the wastewater utility assets, has a similar relationship. Second, Mr. Lykins explained that Citizens utilizes a number of controls to help ensure that it is performing all of its duties and responsibilities as intended by the applicable trusts. These controls include: internal audits and validation of processes, systems, and controls; voluntary compliance with certain aspects of the Sarbanes Oxley Act of 2002, such as an internal controls accountability program; utilization of standards developed by the International Organization for Standardization; and specialized safety training and procedures. Third, Mr. Lykins testified that Citizens utilizes American Water Works Association (“AWWA”) benchmarking surveys and data, along with other factors, to develop annual performance metrics relating to operational excellence, customer satisfaction, employee engagement, and financial integrity. Next, Mr. Lykins testified that Citizens participates in the Baldrige Performance Excellence Program, a customer-focused program intended to enhance the competitiveness, quality, and productivity of U.S. organizations. Citizens’ most recent assessment was completed in June 2013. Finally, Mr. Lykins explained that Citizens has undertaken a number of steps to ensure it complies with its obligations under both the Indiana Open Door Law and the Indiana Access to Public Records Act. These steps include the publication of notices of board of directors meetings and agendas, providing online access to minutes of board meetings, and taking public records requests via its website.

At the evidentiary hearing, Mr. Lykins updated his testimony to reflect his recently-announced plan to retire effective June 30, 2015, as well as Citizens’ succession plans. At the hearing, Mr. Lykins also elaborated on the current state of Citizens’ integration of gas, water, and wastewater services. He testified that the integration was nearly complete, and that the most critical improvements to Citizens’ customer service functions were complete, but training and other work remains to be done. He noted that the conversion to the combined billing system for gas, water, and wastewater was very difficult, in part because the billing system inherited from Veolia was not functional. He testified that the billing process as of today is largely repaired. With regard to the call center, he noted that Citizens underestimated the ease with which they could handle water calls: they take longer than expected, and what worked well for a gas call center needed to be fine-tuned for a combined call center – through a tier redesign, for example.

Mr. Lykins also elaborated on the creation of the SFS function, which he characterized as an important element in enhancing customer service as well as providing synergy savings. Similarly, he commented on Citizens’ Voice of the Customer initiative (discussed in more detail in Mr. Strohl’s testimony), which he projected would produce further improvements in customer service in 2015.

B. Testimony of Michael D. Strohl. Mr. Strohl addressed the billing and customer service challenges faced by Citizens in connection with the acquisition of the water and wastewater utilities, what steps Citizens has taken to address those challenges, Citizens’ Voice of the Customer initiative, the recent reorganization within Citizens to improve the focus on customers, and specific questions from the Commission’s final issues list (relating to issues (F) Customer Service and Compensation Metrics, (G) Application of LIHEAP and USP Funds, and (H) UtilityShield).

With regard to the post-acquisition billing and customer service challenges, Mr. Strohl explained that while Citizens expected to encounter problems, the volume and complexity of problems experienced was not anticipated. Mr. Strohl characterized the combination of meter reading, billing systems, and contact centers as “a massive undertaking.” Regarding meter reading, Mr. Strohl explained that the previous owners of the water and wastewater utilities read meters bi-monthly and estimated bills in the non-read months, and the estimation methodology previously employed in non-read months caused significant swings in customer bills from month-to-month. Post-acquisition, however, Citizens moved to reading most meters monthly. Mr. Strohl further testified that the previous owners of the water and wastewater utilities generated bills using an outdated and unstable software system. Shortly before the acquisition closed, Citizens was notified by the vendor engaged to support and maintain the system that it would no longer support the system after 2012. This necessitated a conversion to a new billing system faster than originally planned or anticipated. Any billing system integration is complicated; however, this accelerated conversion created additional challenges. Despite a significant investment of time and effort by employees and contractors, including numerous system tests, the millions of transactions that were being processed through the system identified myriad issues that did not arise during testing. In response, Citizens formed a cross-functional response team to identify root cause issues, prioritize the issues, and methodically work the issues to resolution. Mr. Strohl testified that the significant billing system issues have been resolved and the system is now functioning as expected.

With regard to the customer call center, Mr. Strohl testified that, post-acquisition, Citizens consolidated its call center operations so that customers would be able to make one call to resolve all of their gas, water, and wastewater concerns. Differences with the customer service offerings between the prior water and wastewater utilities and Citizens’ gas utility supported the need to combine the billing, meter reading, and customer contact centers so as to provide uniform offerings to customers. This consolidation process presented its own call center challenges and was further complicated when Citizens discovered the water call center had not been designed to handle the true call demand under the previous owners. Citizens added 23 additional phone lines, which allowed more incoming calls to enter the queue, exerting pressure on performance statistics at the water call center.

All of these factors, plus the increased volume of calls resulting from billing system issues, resulted in significant demands on the call center and a decline in performance. On top of that, the severe drought in the summer of 2012 and the polar vortex winter of 2013/2014 also created billing questions for customers, placing increased demands and pressure on the call center to perform optimally. In response to these demands and performance issues, Citizens took a number of actions, such as increases in staffing, call-back implementation, and redesigns of the Interactive Voice Response (“IVR”) system and call routing software. Mr. Strohl acknowledged that while call center performance has improved since integration, call wait times are still higher than is desirable. He emphasized that Citizens is taking additional steps to improve performance in this area, such as redesigning the call center “tier” system to equip representatives to handle a broader range of issues on one call. At the evidentiary hearing, Mr. Strohl characterized the current call center performance as much better, but noted there was still work to do. According to Mr. Strohl, Citizens continues to take steps to improve customer service including the Voice of the Customer initiative and a corporate reorganization. Voice of the Customer involves examining and assessing the entire customer service delivery process with the goal of

transforming the customer experience. While this is an ongoing initiative and process, Citizens has identified four key areas on which it believes it must focus: (1) transform its processes to ensure a “customer first” culture, (2) deliver an exceptional digital experience, (3) be easy and transparent to do business with, and (4) offer customers choices. Mr. Strohl described several initiatives already underway in these four areas.

Mr. Strohl explained that the corporate reorganization is part of Citizens’ succession plan and the next step in Citizens’ goal of creating an organizational structure that better enables it to deliver on a customer-first culture. As the Voice of the Customer initiative progressed, it became evident to Citizens that it would be well-served to have an organizational structure that provides a clear view of the entire customer experience across all areas of customer interaction. Accordingly, Citizens’ Customer Relationships department has been organizationally aligned with SFS, the function created after the acquisition that combined areas such as dispatch, customer field services, and meter reading for all utilities. This new structure will better enable a 360-degree view of customer support, from initiation of a new account through the posting of monthly payments, and everything in between.

In addressing specific issues raised in the Commission’s final issues list, Mr. Strohl explained how the customer satisfaction indices are calculated for Executive Incentive Plan purposes, provided the data that supports the MSI gas customer satisfaction index, addressed questions regarding the J.D. Power customer satisfaction survey, addressed questions regarding Citizens’ application of LIHEAP and USP funds, and provided a copy of the contract between Citizens and the third party vendor relating to the UtilityShield program.

With regard to the allocation of LIHEAP and USP funds to non-gas services when combined billing was implemented, Mr. Strohl testified that Citizens applied a total of \$2,018,389 in LIHEAP funds and a total of \$522,432 of USP proceeds to water, wastewater, and non-utility charges for the period October 1, 2012 through April 25, 2014. Mr. Strohl testified that Citizens and the Indiana Housing and Community Development Authority (“IHCDA”) met and agreed that during the transition to combined billing, Citizens should allocate assistance payments across all utility services on combined bills to minimize the potential for confusion, late-payment fees, and disconnection for water and sewer services. Mr. Strohl said Citizens and IHCDA believed they were doing the right thing during the transition to combined billing to apply the assistance across the bill to assist customers, but acknowledged it was a mistake. Mr. Strohl stated that IHCDA has instructed Citizens to change its allocation practices going forward to limit application of LIHEAP funds to only gas services, and that Citizens has complied with that directive.

In response to the Commission’s September 17 Docket Entry, Citizens elaborated that it has determined that no more than 649 LIHEAP customers’ late payment charges could have been impacted by applying LIHEAP funds to non-gas charges. However, Mr. Strohl asserted that the total late payment charges assessed to these customers would be unchanged, or lower, had the LIHEAP funds been applied entirely to gas charges. While applying the total LIHEAP funds to the gas services would have lowered the late payment charges on gas services, it would have increased the outstanding water and/or wastewater charges, resulting in higher water and/or wastewater late payment charges. Respondents’ Exhibit 11 provided illustrative examples of how a customer’s late payment charge would have been unchanged or lower due to misallocation

of LIHEAP funds. Accordingly, Mr. Strohl stated that customers experienced no negative impact from late payment charges as a result of the allocation of LIHEAP funds to non-gas charges. With respect to disconnections and reconnection fees, he explained that data concerning the potential impact from misallocation of LIHEAP funds is not readily available and would take additional time to analyze. However, he committed that once Citizens is able to determine how many and which customers were disadvantaged because their gas service was disconnected when it otherwise would not have been, Citizens will credit the disadvantaged customers' respective accounts for the \$44 reconnect/disconnect fee previously assessed to and paid by such customers.¹

Also in response to the September 17 Docket Entry, Mr. Strohl proposed that, in lieu of the existing bi-weekly reports on call center statistics now provided to the Commission's Consumer Affairs Division, Citizens file a quarterly customer service data report, commencing with the quarter ending December 31, 2014, and continuing for a period of three years. This report (an example of which was included in Respondents' Exhibit 11) would include key operating statistics in the areas of the call center, billing, and meter reading, and would provide explanations for significant deviations in performance.

C. Testimony of Rhonda L. Harper. Ms. Harper explained in her testimony how the acquisition affected the call center, how Veolia (the previous operator of the water utility) operated its call center and measured its call center performance in a different way than Citizens, Citizens' current call center goals, call center response times and abandonment rates, what steps Citizens has taken to help alleviate response and abandonment times, and what future steps Citizens plans to take in this area.

Ms. Harper addressed questions from the Commission's final issues list, all relating to the topic of Call Center Data and Payment Designations. Ms. Harper then addressed current call center goals and call center load and response times.

With regard to the call abandonment rate, Ms. Harper explained that a number of steps have been taken to reduce the abandonment rate, including hiring new associates, changing the tier structure to allow for lower tier associates to handle more calls, adding new lines to the call center to prevent customers from reaching a busy signal, and allowing more self-service options. Ms. Harper noted that Citizens did not anticipate an immediate change in call volume. She described other factors Citizens believes may have contributed to certain increases in calls such as severe weather and associated increases in leaks.

Regarding staffing levels at the call center, Ms. Harper testified that Citizens' staffing levels increased slightly after integration from approximately 90 to 99 full time employees currently (Tr. at A-55), and Citizens engaged in an aggressive hiring plan after experiencing an increase in calls and higher abandonment rates. At the evidentiary hearing, Ms. Harper elaborated on the tier redesign efforts and Citizens' staffing and training initiatives. While acknowledging that further improvement was necessary, Ms. Harper noted that she was excited

¹ Citizens included the Affidavit of Mr. Strohl in its Reply Brief filed on December 5, 2014, and he stated that 100 customers were refunded the \$44 reconnection fee.

about the direction Citizens' customer service was going, in terms of training additional staff and implementing the Voice of the Customer initiative.

Ms. Harper described how complaints previously were captured, and how Citizens has improved the complaint tracking processes to provide visibility into the root cause analysis. Ms. Harper also addressed Citizens' expansion of designated payments to include an over-the-phone transaction capability in addition to the in-person process, which was previously the only method available to customers who wanted to apply payments to specific account charges. She explained that starting July 2014, Citizens had implemented processes and training to allow for customers to designate payments to specific charges via a telephone call to the call center.

Finally, Ms. Harper addressed several steps that Citizens has taken or plans to undertake to further improve customer service and the call center overall. These steps include hiring additional staff and managing attrition, cross-training call center employees, continued development and adjustment of the call center tier approach, requiring overtime when call center volumes are highest, implementing a callback option, call quality coaching, monitoring call queues and adjusting resources to address queues, focusing on first call resolution, and implementing more customer self-service options.

D. Testimony of Leon D. Broughton. Mr. Broughton's testimony provided background information about Citizens' billing and payment operations and explained Citizens' goals with respect to the integration of the billing and payment processes. Mr. Broughton also described the challenges encountered in combining the billing and payment processes post-acquisition and explained the steps Citizens took to manage these issues and to minimize adverse impacts on customers. Mr. Broughton also discussed the current performance of Citizens' combined billing and payment systems and its plans for further improvements.

Mr. Broughton addressed a number of questions from the Commission's final issues list, specifically issues relating to: (A) Call Center Data and Payment Designations; (B) Billing Issues; (C) Payment Application Errors; (D) Meter Reading and Estimation; and (E) Water/Sewer.

Mr. Broughton testified that the goals of Citizens' billing and payment processing are to: (1) provide timely, accurate and informative bills to customers; (2) post payments timely and accurately; and (3) offer convenient billing and payment options for customers. Citizens' integration of the billing and payment processes was to eliminate redundant or overlapping costs and improve customer service.

According to Mr. Broughton, improvements that have resulted from combined billing and payment include: cost savings; simplification for customers; and enhanced customer services. Mr. Broughton explained that these improvements have not been achieved without challenges. One challenge was simply the complexity of combining billing and payment systems. This combination required the development of 395 new rates, 25 new services, 201 new general ledger code combinations, and the issuance of approximately 127,000 new monthly bills. As a result of the billing system integration, Citizens identified and documented over 100 issues. To address these issues, Citizens formed a cross-functional team that identified and defined the issues, risk rated and prioritized the issues, and remedied the issues as quickly as possible. At

the same time, Citizens made sure that its billing controls and safeguards remained in place to prevent or limit the impact of these issues on customers. Mr. Broughton stated that approximately 26,000 customers (8%) were adversely impacted by the billing and payment system integration issues. As of mid-July 2014, all but 10 of these issues had been addressed. Currently, Mr. Broughton characterized the billing and payment systems performance as stable with most of the integration issues resolved. Citizens now is focusing on fully utilizing the billing system's functionality.

Going forward, Mr. Broughton described several initiatives Citizens plans to pursue to further improve its billing and payment processes. These initiatives include: growing the use of eBill; adding a Quick Response code on the bill, which will link the customer via smart phones to useful information that cannot be conveyed on a single page bill; rollout of online payment arrangements; and web-supported budget bill enrollment.

With regard to specific questions posed in the Commission's final issues list, Mr. Broughton addressed the following: the increase in customer enrollment in online billing and customer issues with viewing their online bills, which he stated was now resolved; billing exceptions and steps Citizens has taken to reduce the number of billing exceptions; Citizens' awareness of all service locations served by the City of Indianapolis/Veolia at the time of acquisition; Citizens' process for identifying customers who are receiving service but are not billed, due to illegal connection or reconnection or billing system/human error, and the actions taken to remedy the situation; Citizens' policy and processes regarding back billing customers; Citizens' procedures for implementing customer refunds; and Citizens' procedures used in cases of suspected meter tampering and/or unauthorized usage. He also addressed instances when Citizens may have inadvertently billed a small number of customers for wastewater service when they were not connected to the wastewater system and described a billing integration issue that temporarily caused wastewater service to become disassociated with corresponding water service. He also testified that Citizens is unaware of cases where the billing system has marked a read as "actual" when the utility in fact failed to obtain an actual reading. While acknowledging that human errors do occur, he stated that Citizens believes this is an uncommon occurrence.

Mr. Broughton responded to Commission questions concerning Citizens' December 2013 30-day filing proposal to amend its terms and conditions, which was designed to address 11 business issues resulting from integration of the billing and payment processes. Mr. Broughton explained the events leading up to the December 2013 30-day filing and violation of the Terms and Conditions. Mr. Broughton stated that a cross-functional team reviewed and addressed 11 business issues caused by the modification made to the payment application function of the customer billing system, which had been implemented in October 2012. The team completed its review in November 2013 and recommended the payment application modification be returned to its base functionality; however, this return required a change to the Terms and Conditions and the 30-day filing was submitted in December 2013. In January 2014, Citizens became aware of the two uncommon circumstances, in which Citizens determined that in certain instances, the payment application process has been in violation of its Terms and Conditions. Citizens made the Commission aware of this finding during a February 10, 2014 meeting. Citizens subsequently withdrew the 30-day filing, and the payment application modification has not been returned to its base functionality, leaving the 11 business issues outstanding. Citizens is refining

its proposed solution to the 11 business issues, and plans to refile soon using the 30-day filing process.

Mr. Broughton indicated Citizens did not request a vendor to offer a quote to modify the billing system when the error was found because the base functionality of the billing system did not require modification. Based on Citizens' experience and knowledge of the billing system, Citizens believed it would be expensive to fix the two uncommon circumstances.

Mr. Broughton also discussed Citizens' policy with respect to ownership and rates for sanitary sewer collection systems in residential subdivisions. Mr. Broughton explained that private sewer collection systems do exist on Citizens' system, which are not limited to HOAs. There are a total of 55.88 miles of private sewer collection systems. Mr. Broughton explained that ownership transfers of these systems are rare and are subject to CWA's inspection and easement rights. Any deficiencies in either the easement right or system structural integrity are remedied by the HOA or owner prior to transfer.

Mr. Broughton stated that CWA charges the same rate to all residential customers regardless of ownership of private sewers. In support of its policy, Citizens explains that private sewer systems constitute less than two percent of CWA's overall system length of approximately 3,500 miles. Also, the operation and maintenance expense associated with conveyance from the private sanitary sewers is miniscule in comparison to total conveyance and treatment costs.

E. Testimony of Curtis H. Popp. Mr. Popp's testimony provided background information about Citizens' meter reading operations, meter reading performance and improvements, and Citizens' SFS. Mr. Popp's testimony also responded to specific questions from the Commission's final issues list relating to (D) Meter Reading and Estimation.

Mr. Popp explained that SFS was created with the acquisition of the water and wastewater utilities. The purpose of SFS is to avoid duplicating efforts among the various utility operating divisions. SFS combines operational areas such as dispatch, customer field services, and meter reading.

Mr. Popp testified that gas and water meters were read separately at the time of the acquisition. Gas meters were read monthly, while water meters were read every other month, which led to estimated billing every other month. Post-acquisition, in October 2012, Citizens consolidated gas and water meter reading resulting in the reading of both gas and water meters (approximately 618,000 meters in total) on a monthly basis. Citizens was able to achieve consolidated monthly meter reading at a significantly lower cost than estimated by the previous owner due to both synergies of consolidating water and gas operations as well as Citizens' use of cross-trained meter readers.

Mr. Popp testified that combining meter reading routes was a monumental task. To make effective use of routing software, all 618,000 combined gas and water meter reads had to be located in a common database with precise geographical coordinates. Next, customer accounts had to be assigned to appropriate billing cycles. Once this was complete, the routing software system designed meter reading routes based upon factors such as productivity rates, walking distance, and meter type. Once designed, a sampling of the designed routes was field-tested and

adjustments were made as necessary.

Mr. Popp explained that significant training was required as well. Newly-hired, part-time meter readers had to be trained for both water and gas meter reading procedures, and existing meter readers had to be cross-trained to read either gas or water meters. At the same time, meter readers were needed to test the new combined routes. All of this work had to be performed while still reading water and gas meters on the then-existing routes.

Mr. Popp testified that, excluding weather-related nonreads, Citizens' meter read rate has averaged 97.4% since January 2013. The read accuracy rate for both water and gas meters is 99.9%. Still, there are times when meters are not read (and as a result, bills are estimated) for a variety of reasons, including inclement weather and weather-related obstructions, and lack of accessibility to the meter. The number of meters that Citizens is unable to locate amounts to about 0.2% of total meter reads each month.

Mr. Popp also addressed specific questions included on the Commission's final issues list relating to the percentage of meters read each month, what Citizens does to remedy the issue of non-reads, Citizens' processes for addressing inaccessible meters, Citizens' processes for handling customer complaints regarding possible meter malfunction and actions Citizens takes to ensure malfunctioning meters are replaced in a timely manner, and Citizens' procedures for taking or estimating final reads when a customer requests a disconnection or transfer of service. Citizens identified this latter issue as an opportunity to enhance customer service, and as of September 2014, Citizens began contracting with a third party to obtain all off-cycle reads, including final reads when a customer requests a disconnection or transfer of service. Thus, barring a meter obstruction or similar problem, customers with disconnections or transfers of service will no longer receive estimated bills.

Mr. Popp also discussed some of Citizens' future meter reading plans, such as plans for dealing with inside meters. Citizens has used Encoder Receiver Transmitters ("ERTs"), a form of advanced metering technology, in its gas utility for several years. Since the acquisition of the water and wastewater utilities, Citizens has begun to employ ERTs for water meters, as well, in situations where there is a safety concern or a meter access issue. Currently, Citizens is rolling out installation of ERTs at a rate of about 4,000 annually. Citizens plans to continue this "surgical approach" to installing ERTs on gas and water meters.

F. Testimony of David J. Wathen. Mr. Wathen, Director, Talent & Rewards Practice Leader, for Towers Watson, heads the firm's utility industry compensation team. Mr. Wathen testified about compensation benchmarking generally, explaining that a study covering compensation benchmarking and at-risk compensation plan review would typically entail: (1) review and validation of the executive compensation philosophy, (2) benchmark analysis of selected executive positions using applicable industry-specific and/or general industry surveys, (3) review of competitiveness of short and long-term at-risk compensation plan designs relative to market, (4) assessment of gaps to market in both level of compensation and design, and (5) identification of possible compensation and plan design considerations that would better align compensation and plan designs with market practices.

G. Testimony of Jodi L. Whitney. Ms. Whitney's testimony addressed

certain aspects of (F) Customer Service and Compensation Metrics. Specifically, Ms. Whitney discussed how base salaries are determined for non-executive/non-bargaining, executive, or bargaining unit employees; explained that Citizens did not separately review base salaries at other municipal/not-for-profit utilities in Indiana; explained how benchmarking characteristics are used when comparing jobs for purposes of determining base pay; explained the customer satisfaction components of Citizens' Short-Term Incentive Program ("STIP") and Executive Incentive Program ("EIP"); discussed minimum thresholds used for EIP and STIP; described the EIP competitive rates component; explained EIP gas and steam system reliability components; explained the basis for the different "at risk" components in STIP for executive and non-executive employees; provided a copy of the 2012 National Malcolm Baldrige Feedback Report; and provided copies of analyses related to Citizens' compensation for the last three years. In addition, in Respondents' Exhibit 10, Ms. Whitney included the summary presentation of a recent compensation analysis, which was performed by Towers Watson and presented to Citizens' Board of Directors in September 2014.

3. OUC's Case-in-Chief Evidence. The OUC presented the testimony of Heather R. Poole, Senior Utility Analyst. Ms. Poole focused on certain concerns the OUC has in relation to this investigation, specifically the application of LIHEAP and USP funds and the UtilityShield program.

With regard to the application of LIHEAP and USP funds, Ms. Poole noted that per Mr. Strohl's testimony, Citizens applied LIHEAP funds of \$966,087 to wastewater charges, \$1,021,758 to water charges, and \$30,544 to non-utility charges. Ms. Poole stated that the Energy Assistance Program Memorandum of Understanding between Citizens and the IHDA does not provide guidance on how LIHEAP funding should be allocated; however, the Low Income Home Energy Assistance Act of 1981 as amended by the Energy Policy Act of 1999 and 2005 provide guidance as to the definition of "home energy" as "a source of heating or cooling in residential dwellings." Ms. Poole testified that such funds should only have been applied to gas charges, not to water, wastewater, or non-utility charges as those items do not provide a source of heating or cooling in residential dwellings.

Similarly, Ms. Poole noted that, per Mr. Strohl's testimony, Citizens applied \$522,011 of total USP discount credits to the water and wastewater portions of customers' bills and \$421 to the non-utility portions of customers' bills. Ms. Poole testified that USP funds are collected from gas customers for gas customers. Ms. Poole also referenced Cause No. 44094, in which Citizens Gas requested authority to modify its currently approved USP to replace a portion of the projected reductions in LIHEAP funding and enable assistance to Citizens Gas' qualified low-income customers. Ms. Poole cited the Commission's Order in Cause No. 44094, which stated, "The most obvious impact is the reduction of available benefits to help low-income customers manage their winter heating bills." She noted that the Commission also discussed how the continued receipt of heating assistance is important to both the utilities and the communities they serve.

The OUC recommended Citizens contribute \$2,540,821 (equivalent to the total misallocated LIHEAP and USP funds of \$2,018,389 and \$522,432, respectively) for the upcoming winter heating season to Citizens' low-income gas customer bills only, and that this contribution should be in addition to the 25% of normal funding required to be contributed to the

USP fund by Citizens' gas utility, as found in Cause No. 44094. Further, the OUCC recommended Citizens should not be allowed to seek reimbursement for this \$2,540,821.

With regard to the UtilityShield program, Ms. Poole testified that Citizens promotes the UtilityShield program through direct mail and on Citizens' website, and that such promotional materials bear Citizens' name and logo. Ms. Poole also testified letters sent to customers are signed by Citizens' employees and indicate the promotional materials are coming directly from Citizens. Further, she noted that some of the promotional materials that bear Citizens' name and logo do not mention the Manchester Group, the actual provider of the UtilityShield program. Ms. Poole also testified that the Indiana Department of Insurance (the "Department") was resistant to renew its Memorandum of Understanding with the Manchester Group due to the Department's lack of jurisdiction over Manchester Group and its products. In the OUCC's view, the use of Citizens' name and logo, as well as the language in the promotional materials, creates an impression that the product is sold and administered by Citizens. Yet, these UtilityShield products are not directly regulated by the Commission or the Department. The OUCC recommended that Citizens no longer promote UtilityShield with the Citizens name or logo because this is not a Citizens product and should not be marketed as such. The OUCC recommends that all UtilityShield promotional materials be printed on UtilityShield letterhead with a clear indication that these products are not related to Citizens in any way.

4. Citizens' Rebuttal Testimony. Citizens presented rebuttal testimony from Mr. Strohl. Mr. Strohl addressed the LIHEAP/USP allocation of funds issues and the UtilityShield issues raised by the OUCC. With respect to the LIHEAP/USP issue, Mr. Strohl acknowledged in his direct testimony that Citizens had misallocated LIHEAP and USP funds but emphasized Citizens had made changes to its billing system to ensure that the misallocation would not recur in his rebuttal testimony. Specifically, Mr. Strohl testified that the necessary changes have been made to the billing system, and those changes have been tested ensuring that LIHEAP funds and USP proceeds will only be applied to eligible gas utility services.

Mr. Strohl disagreed with the OUCC's recommendation that Citizens contribute an additional \$2,540,821 for low-income customers for the upcoming winter heating season. He explained that such an additional contribution is neither appropriate nor necessary because each and every customer who received LIHEAP assistance or USP credits received exactly the same amount of assistance and/or credits as they would have received in the absence of Citizens' misallocation (albeit allocated to services other than gas). No customer failed to receive assistance or credit that otherwise would have, nor did any customer receive a different amount of assistance or credit. The assistance or credit to which a customer was entitled was simply allocated on the customer's bill improperly. As Mr. Strohl testified at the evidentiary hearing: "no customer received funds that they shouldn't have received: no customer didn't receive funds if they were eligible to receive them, and they got exactly the amount that they were entitled to get." Tr. at A-43.

With regard to the UtilityShield program, Mr. Strohl pointed out that Citizens includes a footnote on each mailer to customers indicating that UtilityShield is a product of the Manchester Group and that the Manchester Group is not a Citizens company. Additionally, each mailer includes a Q&A section about UtilityShield that notes that UtilityShield is a Manchester Group

product and that the Manchester Group is owned by a separate company, IGS Energy. Moreover, the Q&A section of the mailer also clearly indicates that the revenue received by Citizens from the UtilityShield product is contributed to Citizens' Warm Heart Warm Home Foundation. Additionally, Citizens posts the Service Agreement for the program to its website and includes information for customers to make an informed decision about the product. Citizens also provides a courtesy copy of all marketing materials to Commission Staff prior to their use. In sum, Mr. Strohl opined that Citizens has been fully transparent with its customers about the UtilityShield product, the Manchester Group, and the use of revenue received by Citizens.

Mr. Strohl also explained that the Department was resistant to continuing its Memorandum of Understanding with the Manchester Group simply because it recognized that the Manchester Group is a private, non-regulated entity over which they have no insurance regulatory authority. Notwithstanding this, the Manchester Group, despite no requirement to do so, voluntarily offered to file annual notices of operations with the Department, setting forth its commitment to continue operating under the terms and conditions of the previous Memorandum of Understanding. In Mr. Strohl's view, this demonstrates the Manchester Group's commitment to be transparent about its business in Indiana.

Mr. Strohl emphasized that UtilityShield is a non-regulated product that customers may choose to purchase; customers are given a 30-day free look and can cancel the contract at any time during that 30-day period. If a customer keeps the product for more than 30 days and subsequently becomes dissatisfied, they can simply stop paying the monthly payment and the service agreement will be cancelled. Citizens is not responsible for any aspect of the service delivery of the product. Citizens allows the Manchester Group to bill the customer for the product via the Citizens bill, and all other aspects of the provision of services are between the customer and the Manchester Group. Citizens receives a commission from the Manchester Group, and those commissions, in their entirety, are contributed to Citizens' Warm Heart Warm Home Foundation.

Mr. Strohl concluded his testimony on this issue by noting that the UtilityShield product has been purchased by over 17,000 Citizens customers since 2010, and Citizens has received over \$900,000 in commissions, all of which have been contributed to the Warm Heart Warm Home Foundation, which provides support to low-income families in need of assistance. Further, at the evidentiary hearing, Mr. Strohl testified that a good number of customers have filed claims and received payments under the UtilityShield program. At the same time, in response to discovery in this case, the OUCC did not identify any customer complaints regarding this program.

5. Commission Discussion and Findings.

A. Call Center Data and Payment Designations. The evidence indicates that while Citizens' call center performance has improved in terms of speed of answer and abandonment rate, the call center can still make further improvements in these areas. Mr. Strohl's testimony acknowledges that Citizens recognizes the need for improvement. Mr. Strohl said, "We continue to strive to improve the call center performance and have seen increasingly

improving results throughout 2014, although we are not yet where we want to be with respect to the call center.” The Commission is encouraged by Citizens’ staffing, training, internal assessments and tier redesign initiatives, and its implementation of over-the-telephone payment designation functionality. We are optimistic that Citizens has implemented processes to improve call center quality and communication with customers.

Mr. Strohl proposed that, in lieu of the existing bi-weekly reports on call center statistics now provided to the Commission’s Consumer Affairs Division, Citizens file a quarterly customer service data report, commencing with the quarter ending December 31, 2014, and continuing for a period of three years. This report (an example of which was included in Respondents’ Exhibit 11) would include key operating statistics in the areas of the call center, billing, and meter reading, and would provide explanations for significant deviations in performance.

Based on the evidence and the directional improvement shown over the course of this proceeding, we believe that additional reporting over one year, rather than a three-year period, would be sufficient to confirm continued call center performance. We find that Mr. Strohl’s proposed quarterly report is a reasonable approach, and that Citizens shall file with the Commission, under this Cause, the proposed quarterly customer service data reports, as set forth in Para. 5.J. below.

B. Billing Issues. The evidence indicates that Citizens experienced several unanticipated issues resulting from the complex integration of the gas, water, and wastewater billing systems. The evidence also indicates that Citizens discovered and eventually resolved those issues. Currently, the billing system is stable and performing as expected. In order to monitor Citizens’ continued performance in this area on an ongoing basis, Citizens shall comply with the reporting requirements set forth in Para. 5.J. below.

C. Payment Application Errors. The evidence indicates that Citizens’ December 2013 30-day filing proposal to amend its terms and conditions was designed to address 11 business issues resulting from integration of the billing and payment processes. The evidence further indicates that Citizens withdrew that proposal in early 2014. As of the date of this Order, these issues remain unresolved. Accordingly, we find that within 60 days of the date of this Order, after consultation with the OUCC to resolve these issues, Citizens should file a proposal with the Commission using the Commission’s 30-day filing procedures.

D. Meter Reading and Estimation. The evidence indicates that, overall, Citizens has improved its performance in the area of meter reading; however, areas of concern remain. Citizens has often estimated final meter reads for customers upon disconnection or transfer of service instead of performing actual meter reads in such circumstances because Citizens considered final meter reads to be a lower priority issue. Citizens provided evidence that it has recently contracted with a third party to fulfill this final actual meter reading function with the expectation that all final reads due to disconnection or transfer of service will be made on an actual basis. We believe this is a positive change that will be beneficial to customers.

The Commission has concerns that Citizens believes that estimating indefinitely is an appropriate practice if the customer does not respond to passive contact or complain about the

bill estimation. For customers who have a meter that must be accessed from inside the home, the Commission believes the utility has an obligation to escalate to more proactive methods to address the lack of meter information such as disconnection notices, disconnection, and technician visits to retrofit the meter to automated meter reading (“AMR”) so physical access is not needed for every read. In some instances, service disconnection may be necessary because the end use customer has not complied with their obligations as set forth in Citizens’ Terms and Conditions for Service to provide access to the meter. In order to monitor Citizens’ continued performance in this area on an ongoing basis, Citizens shall comply with the reporting requirements set forth in Para. 5.J. below.

E. Water/Sewer. The evidence shows that Citizens may have billed a small number of customers for wastewater service when they were not connected to the wastewater system, and that one of the billing integration issues caused wastewater service to become disassociated with the corresponding water service. The evidence also indicates that these issues have been resolved. In addition, Citizens discussed its policies concerning ownership of and rates for sanitary sewer collection systems located in residential subdivisions. To the extent issues remain, the Commission believes that informal discussions with Citizens and the OUCC would be effective to achieve resolution. On or before June 30, 2015, Citizens shall update the Commission by filing a report under this Cause that sets forth any additional issues that have been raised through these informal discussions. On or before December 31, 2015, Citizens shall file a final report under this Cause setting forth how those issues have been resolved.

F. Customer Service and Compensation Metrics. The evidence shows that customer service metrics factor into Citizens’ compensation plans. For example, Citizens utilizes AWWA benchmarking surveys and data, along with other factors, to develop annual performance metrics relating to operational excellence, customer satisfaction, employee engagement, and financial integrity. Additionally, Citizens participates in the Baldrige Performance Excellence Program. Further, Citizens adequately responded to our questions concerning its compensation plans. Finally, we note that in Cause No. 44306, we directed Citizens to address certain compensation issues in its next base rate case. Citizens provided an abbreviated PowerPoint presentation overview of Towers Watson’s Executive Compensation analysis² in IURC DER–2.19, attached to Respondent’s Ex. 10, but did not provide the complete compensation analysis. Within 10 days from the effective date of this Order, Citizens shall file, under this Cause, the complete compensation analysis report performed by Towers Watson.

G. Application of LIHEAP and USP Funds. The evidence shows that Citizens misallocated \$2,018,389 in LIHEAP funds and \$522,432 in USP funds for the period of October 1, 2012, through April 25, 2014, by allocating those funds to water, wastewater, and non-utility services rather than allocating all such funds to gas services only. Citizens stated that it has modified its billing system to ensure that, going forward, all LIHEAP and USP funds will be allocated only to gas services. Accordingly, we find that Citizens has remedied the situation and should, on a going-forward basis, properly allocate all LIHEAP and USP funds only to eligible customers’ gas services.

² This presentation was given to the Citizens Board of Directors on September 24, 2014.

With respect to the misallocation of funds, Citizens suggests that all customers that were entitled to such funds received such funds, and that all such customers received precisely the amount of such funds to which they were entitled. As stated in the OUCC's testimony, the Low Income Home Energy Assistance Act of 1981, as amended by the Energy Policy Act of 1999 and 2005, defines "home energy" as "a source of heating or cooling in residential dwellings." Our Order in Cause No. 44094 also specifically states USP funds should be used to help low-income customers manage their winter heating bills. While there may not have been a direct, adverse impact on customers resulting from Citizens' misallocation of such funds, we cannot ignore the fact that Citizens chose to ignore the intended purpose of these funds. The issue is not whether funds were used by qualified customers, but rather whether funds were used for heating assistance.

Accordingly, we must identify an appropriate remedy. As previously noted, \$2,540,821 in LIHEAP and USP funds were improperly applied to non-heating services, which is contrary to the purpose of the funding. This misappropriation occurred over a two year period. The OUCC recommended that Citizens contribute \$2,540,821 to Citizens' low-income gas customers in the upcoming heating season. Citizens countered in its reply brief that low-income customers received the funding they were due, albeit not as heating assistance; therefore, no further action is required.

We note that LIHEAP is federally funded indirectly by all taxpayers, whereas USP is funded in part by Citizens' gas ratepayers. We find that the appropriate remedy is for Citizens to provide additional funding for USP in the amount that was misappropriated from USP, in order to make the gas ratepayer whole by offsetting the amount to be collected from those ratepayers. Rather than having Citizens provide that funding in a single year, we find that a total of \$522,432 shall be provided in the next two heating seasons, i.e., winter 2015-2016 through winter 2016-2017, which will provide assistance over the same timeframe as the misappropriation took place. This assistance is in addition to the Commission's requirements under Cause No. 44094 and shall not be recoverable through rates. Any contributions related to this directive will not be counted as part of the 25% match required from Citizens for the USP. The additional amounts to be contributed shall be reflected within the annual USP filing under Cause No. 44094.

Finally, Citizens provided evidence that a number of customers may have been adversely impacted by this misallocation of funds, to the extent that certain customers may have been disconnected for nonpayment of their gas services and had to pay reconnect fees. At the hearing, Citizens committed to track down the number and identity of customers who were affected in this manner and reimburse each such customer for the reconnection fee assessed and paid. In its Reply Brief, Citizens included the Affidavit of Mr. Strohl, who stated that 100 customers were refunded the \$44 reconnection fee.

H. UtilityShield. Citizens claimed that Citizens and the Manchester Group have worked to ensure that customers are adequately informed about the UtilityShield product, including the fact that it is not a Citizens product. Moreover, Citizens suggested that Citizens' customers use and benefit from the availability of the UtilityShield product, customers have not complained to Citizens or the OUCC about this product, and the revenues Citizens receives from this product are used to benefit low-income customers through the Warm Heart Warm Home Foundation.

The OUCC expressed concern that UtilityShield is being offered to Citizens' customers in a way that indicates the product is being sold or administered by Citizens. We note that the Service Agreement in place between Citizens and the Manchester Group requires that Citizens be consulted about all materials that use Citizens' name or logo. The OUCC recommended Citizens no longer be permitted to use its logo or name to promote UtilityShield.

While many of the materials indicated that Manchester Group is not affiliated with Citizens, some do not. *See, e.g.*, Public's Exhibit 1, HRP Attachment 4, pp. 8-9 of 32, 12-13 of 32, 18-19 of 32. Further, some of the billing inserts are on Citizens' letterhead signed by a company official. For instance, one insert was signed by Mr. Strohl as Citizens' Senior Vice President, Customer Relationships and Corporate Affairs. The insert begins, "At Citizens Energy Group, we are continually striving to bring you the best products and services to meet your needs. In order to protect your lines from expensive utility line failures, we are proud to introduce UtilityShield." *Id.* at p. 2 of 32. Similarly, the question and answer section includes a statement that "UtilityShield is a Manchester Group product made available to you by Citizens Energy Group." *Id.* at p. 3 of 32. The insert also states, "As a Citizens Energy Group Customer, you are eligible to receive utility line protection with UtilityShield." While this insert and others do include language that Manchester Group is not an affiliate of Citizens, the overall tenor of the communication could result in confusion.

Accordingly, we agree that Citizens should implement the OUCC's recommendations concerning the use of Citizens' name and logo in connection with the marketing of the UtilityShield product. Therefore, Citizens shall no longer offer UtilityShield marketing and promotional materials to customers that contain Citizens' logo or utilize Citizens' letterhead, and all Manchester Group materials that are offered must clearly indicate that the UtilityShield product is not a product of Citizens but a product of the Manchester Group, which is not a Citizens company.

I. Background Information. Citizens discussed its traditional utility obligations to both City of Indianapolis/Marion County customers and customers outside of Marion County, e.g., the obligation to provide utility service at a reasonable cost. In addition to these traditional utility obligations, Citizens also discussed its obligation as a trustee to City of Indianapolis/Marion County residents to confer benefit on such inhabitants, whether through the utility operations controlled by Citizens Energy Group, or the wastewater utility operations owned by CWA Authority, Inc. Citizens discussed a number of controls it believes help ensure that it is performing all of its duties and responsibilities as intended by the applicable trusts. Citizens also discussed its efforts to meet its obligations under both the Indiana Open Door Law and the Indiana Access to Public Records Act.

J. Reporting. With respect to the reporting requirements discussed in Para. 5.A., quarterly reporting discussed above shall include the following call center metrics by month: number of calls received; number of calls handled; average speed of answer; average handle time; percentage of calls abandoned; number of complaints received; call center full time employees ("FTEs"); a chart detailing call wait times such as the one provided on page 6 of Respondent's Ex. 5 (Ms. Harper's testimony); and any explanations for significant changes in performance.

With respect to the reporting requirements discussed in Para. 5.B., Citizens' quarterly customer service data reports, which are described above, should include the following billing metrics by month: services with actual reads (gas and water); services with estimated reads (gas and water); services with billing exceptions at the end of the month; billing adjustments, in terms of both number of accounts and dollar amounts; leak adjustments (water), in terms of both number of accounts and dollar amounts; description of billing system problems, proposed resolution, and anticipated date of resolution; description of payment application function problems, proposed resolution, and anticipated date of resolution; and any explanations for significant changes in performance.

With respect to the reporting requirements discussed in Para. 5.D., Citizens' quarterly customer service data reports shall include the following metrics by month: meter reading completion rate (gas and water), meter reading accuracy rate (gas and water), number of meter reading routes, number of meter reading FTEs, number of final bills that were actually read, number of final bills that were estimated, and any explanations for significant changes in performance.

Citizens shall file with the Commission, under this Cause, the proposed quarterly customer service data reports, commencing with the quarter ending December 31, 2014, and continuing through the end of calendar year 2015. The quarterly report for the period ending December 31, 2014, shall be due within 30 days of the issuance of the Final Order in this Cause. Thereafter, quarterly reports shall be filed within 30 days of the end of the relevant quarter. This quarterly reporting requirement will replace the bi-weekly reports currently provided to the Commission's Consumer Affairs Division.

IT IS THEREFORE ORDERED BY THE INDIANA UTILITY REGULATORY COMMISSION THAT:

1. Citizens shall file with the Commission quarterly customer service data reports under this Cause, commencing with the quarter ending December 31, 2014, and continuing through the end of calendar year 2015, containing the data described in Para. 5.J. above.

2. Within 60 days of the date of this Order, Citizens shall file, using the Commission's 30-day filing procedures, a proposal with the Commission to resolve the billing and tariff issues reflected in Citizens' December 2013 30-day filing proposal as described in Para. 5.C. above.

3. Within 10 days from the effective date of this Order, Citizens shall file the complete compensation study discussed in Para. 5.F. above.

4. Citizens shall, on a going forward basis, allocate all LIHEAP and USP funds only to eligible customers' gas services. Citizens shall contribute an additional \$261,216 to the USP in each of the next two winter heating seasons to repay the misallocated USP funds. The additional amounts to be contributed will be reflected within the annual USP filing under Cause No. 44094.

5. As described in Para. 5.H., all UtilityShield marketing and promotional materials provided to customers shall no longer include Citizens' letterhead or logo and shall clearly indicate that the UtilityShield product is not a product of Citizens but a product of the Manchester Group, which is not a Citizens company.

6. In accordance with Ind. Code § 8-1-2-70, Citizens shall pay the following charge within 20 days from the effective date of this Order to the Secretary of the Commission, as well as any additional costs that were or may be incurred in connection with this Cause:

Commission charges:	\$ 9,541.74
OUCG charges:	\$ 22,803.44
Legal Advertising charges:	\$ <u>100.57</u>
Total:	\$ 32,445.75

7. This Order shall be effective on and after the date of its approval.

MAYS-MEDLEY, HUSTON, AND ZIEGNER CONCUR; STEPHAN AND WEBER NOT PARTICIPATING:

APPROVED: MAR 04 2015

I hereby certify that the above is a true and correct copy of the Order as approved.



**Brenda Howe
Secretary to the Commission**