

**Response to Nicor
First Set of Data Requests to GCI**

**GCI witness Barbara R. Alexander
Consumer Affairs Consultant
(207) 395-4143**

NG-GCI 1.02:

For the years 2007 - 2009, please provide the number of complaints members of the GCI have received from Nicor Gas customers, as described in disclosure issue type 1 (Alexander Dir., p. 5, ln. 111), that support your recommended changes to Section 280.30. For each complaint identified, please provide (a) the customer name, (b) address, (c) account number, (d) date the complaint was filed, and (e) when the complaint was resolved.

Response: Ms. Alexander has not undertaken an analysis of consumer complaints received by any member of GCI specific to the referenced testimony. Ms. Alexander's testimony is intended to recommend a generic rule that should be applicable to all utilities governed by Part 280 and is not a reflection of any particular utility's current practices. Ms. Alexander's experience notwithstanding, each member of GCI responds as follows:

CUB's Response:

CUB objects to this request as overly broad and unduly burdensome. Subject to and notwithstanding the objections, CUB responds that it would be unduly burdensome to provide the universe of responsive documents, which could include thousands of consumer complaints. Further answering, CUB's database does not have the capability to sort complaints by the exact scenario described in the referenced testimony. Such a search would require a manually review of the over 100,000 complaints filed with CUB since late-1998. This is clearly unduly burdensome.

CUB receives a wide variety of complaints related to utility service. Sometimes consumers contact CUB with inquiries, seeking explanation of their bills and their rights under the relevant law and rules, rather than to file a complaint. Likewise, consumers calling to lodge a complaint,

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about their service being shut off for example, may also have questions or concerns about the billing procedures discussed in the referenced testimony. For example, often a billing question or concern is expressed during the course of the consumer's contact with CUB Consumer Rights Specialists, but that is not the primary issue with which the consumer seeks assistance and therefore may or may not be captured in the complaint record. Indeed, often there are several interrelated billing issues addressed in one consumer contact and only the particular inquiry, question or concern that requires action on behalf of the CUB Consumer Rights Specialists will be captured in the "Concern field" of the complaint form. A report of the complaints in the database can only be run on fields where the user has to choose from a pre-programmed list of options. The "Concern field" which captures the subject of the complaint is in fact such a reportable field, but there is only one such field per complaint. The "Summary field" which captures the entire complaint is an open-ended field where the user does not choose from a pre-programmed list, but rather types freely is not a reportable field. In order to determine which complaints relate to the referenced testimony, a manual review of the "Summary field" would be required. Even such a search, which is clearly unduly burdensome, would not necessarily capture the universe of responsive documents and would therefore not fairly represent CUB's experience with the exact scenario in the referenced testimony.

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City's Response:

The City does not maintain records of customer complaints regarding utility service based on types of complaints. With that said, most customer complaints about utility service submitted to the City concern reliability and bill payment issues.

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NG-GCI 1.04:

For the years 2007-2009, please provide the number of complaints that members of the GCI have received from Nicor Gas customers, as described in disclosure issue type 2 (p. 5, ln. 120), that support your recommended changes to Section 280.30. For each complaint identified, please provide (a) the customer name, (b) address, (c) account number, (d) date the complaint was filed, and (e) when the complaint was resolved.

Response: Ms. Alexander has not undertaken an analysis of consumer complaints received by any member of GCI specific to the referenced testimony. Ms. Alexander's testimony is intended to recommend a generic rule that should be applicable to all utilities governed by Part 280 and is not a reflection of any particular utility's current practices. Ms. Alexander's experience notwithstanding, each member of GCI responds as follows:

CUB: Please see CUB's response to NG-GCI 1.02.

City: Please see the City's response to NG-GCI 1.02.

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NG-GCI 1.05:

Please provide all data relied up that supports your claim that customers incorrectly assume that such information is a required element of the applications service (p. 5, lns. 124-25)? Can you quantify the number of customers that incorrectly assume such information is a required element of the application service?

Response: See Response to AIU-GCI 1.04.

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NG-GCI 1.06:

For the years 2007-2009, please provide the number of complaints that members of the GCI have received from Nicor Gas customers, as described in disclosure issue type 3 (p. 6, ln. 136), that support your recommended changes to Section 280.40. For each complaint identified, please provide (a) the customer name, (b) address, (c) account number, (d) date the complaint was filed, and (e) when the complaint was resolved.

Response: Ms. Alexander has not undertaken an analysis of consumer complaints received by any member of GCI specific to the referenced testimony. Ms. Alexander's testimony is intended to recommend a generic rule that should be applicable to all utilities governed by Part 280 and is not a reflection of any particular utility's current practices. Ms. Alexander's experience notwithstanding, each member of GCI responds as follows:

CUB: Please see CUB's response to NG-GCI 1.02.

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NG-GCI 1.07:

Provide an example of Nicor Gas failing to disclose a deposit demand letter to a customer (p. 6, lns. 141-42).

Response: Ms. Alexander has not undertaken an analysis of consumer complaints received by any member of GCI specific to the referenced testimony. Ms. Alexander's testimony is intended to recommend a generic rule that should be applicable to all utilities governed by Part 280 and is not a reflection of any particular utility's current practices. Ms. Alexander's experience notwithstanding, each member of GCI responds as follows:

CUB: Please see CUB's response to NG-GCI 1.02.

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NG-GCI 1.08:

For the years 2007-2009, please provide the number of complaints that members of the GCI have received from Nicor Gas customers, as described in disclosure issue type 4 (p. 6, ln. 148), that support your recommended changes to Section 280.50. For each complaint identified, please provide (a) the customer name, (b) address, (c) account number, (d) date the complaint was filed, and (e) when the complaint was resolved.

Response: Ms. Alexander has not undertaken an analysis of consumer complaints received by any member of GCI specific to the referenced testimony. Ms. Alexander's testimony is intended to recommend a generic rule that should be applicable to all utilities governed by Part 280 and is not a reflection of any particular utility's current practices. Ms. Alexander's experience notwithstanding, each member of GCI responds as follows:

CUB: Please see CUB's response to NG-GCI 1.02.

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NG-GCI 1.09:

For the years 2007 – 2009, please provide the number of complaints that members of the Governmental and Consumer Intervenors have received from Nicor Gas customers, as described in disclosure issue type 5 (p. 7, ln. 169), that support your recommended changes to Subpart E, Payment. For each complaint identified, please provide (a) the customer name, (b) address, (c) account number, (d) date the complaint was filed, and (e) when the complaint was resolved.

Response: Ms. Alexander has not undertaken an analysis of consumer complaints received by any member of GCI specific to the referenced testimony. Ms. Alexander's testimony is intended to recommend a generic rule that should be applicable to all utilities governed by Part 280 and is not a reflection of any particular utility's current practices. Ms. Alexander's experience notwithstanding, each member of GCI responds as follows:

CUB: Please see CUB's response to NG-GCI 1.02.

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NG-GCI 1.11:

For the years 2007-2009, please provide the number of complaints that members of the GCI have received from Nicor Gas customers, as described in disclosure issue type 6 (p. 8, ln. 191), that supports your recommended changes to Subpart H, Payment Arrangements. For each complaint identified, please provide (a) the customer name, (b) address, (c) account number, (d) date the complaint was filed, and (e) when the complaint was resolved.

Response: Ms. Alexander has not undertaken an analysis of consumer complaints received by any member of GCI specific to the referenced testimony. Ms. Alexander's testimony is intended to recommend a generic rule that should be applicable to all utilities governed by Part 280 and is not a reflection of any particular utility's current practices. Ms. Alexander's experience notwithstanding, each member of GCI responds as follows:

CUB: Please see CUB's response to NG-GCI 1.02.

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NG-GCI 1.12:

Referencing page 9, lines 203-07, please provide an example of when a Nicor Gas customer agrees to a deferred payment arrangement and Nicor Gas does not send a confirmation notification to the customer.

Response: Ms. Alexander has not undertaken an analysis of consumer complaints received by any member of GCI specific to the referenced testimony. Ms. Alexander's testimony is intended to recommend a generic rule that should be applicable to all utilities governed by Part 280 and is not a reflection of any particular utility's current practices. Ms. Alexander's experience notwithstanding, each member of GCI responds as follows:

CUB: Please see CUB's response to NG-GCI 1.02.

City: Please see the City's response to NG-GCI 1.02.

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NG-GCI 1.13:

For the years 2007 – 2009, please provide the number of complaints that members of the GCI have received from Nicor Gas customers, as described in disclosure issue type 7 (p. 11, ln. 247), that support your recommended changes to Subpart N, Information. For each complaint identified, please provide (a) the customer name, (b) address, (c) account number, (d) date the complaint was filed, and (e) when the complaint was resolved.

Response: Ms. Alexander has not undertaken an analysis of consumer complaints received by any member of GCI specific to the referenced testimony. Ms. Alexander's testimony is intended to recommend a generic rule that should be applicable to all utilities governed by Part 280 and is not a reflection of any particular utility's current practices. Ms. Alexander's experience notwithstanding, each member of GCI responds as follows:

CUB: Please see CUB's response to NG-GCI 1.02.

City: Please see the City's response to NG-GCI 1.02.

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NG-GCI 1.14:

For the years 2007 – 2009, please provide the number of complaints that members of the GCI have received from Nicor Gas customers regarding their request for a different deferred payment arrangement (“DPA”) from Nicor Gas than the DPA offered in Nicor’s tariffed terms and conditions. For each complaint identified, please provide the customer name, address and account number.

Response: Ms. Alexander has not undertaken an analysis of consumer complaints received by any member of GCI specific to the referenced testimony. Ms. Alexander’s testimony is intended to recommend a generic rule that should be applicable to all utilities governed by Part 280 and is not a reflection of any particular utility’s current practices. Ms. Alexander’s experience notwithstanding, each member of GCI responds as follows:

CUB: Please see CUB’s response to NG-GCI 1.02.

City: Please see the City’s response to NG-GCI 1.02.

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NG-GCI 1.15:

For the years 2007 – 2009, please provide the number of complaints that members of the GCI have received from Nicor Gas customers claiming insufficient notice prior to disconnection for non-payment. For each complaint identified, please provide (a) the customer name, (b) address, (c) account number, (d) date the complaint was filed, and (e) when the complaint was resolved.

Response: Ms. Alexander has not undertaken an analysis of consumer complaints received by any member of GCI specific to the referenced testimony. Ms. Alexander’s testimony is intended to recommend a generic rule that should be applicable to all utilities governed by Part 280 and is not a reflection of any particular utility’s current practices. Ms. Alexander’s experience notwithstanding, each member of GCI responds as follows:

CUB: Please see CUB’s response to NG-GCI 1.02.

City: Please see the City’s response to NG-GCI 1.02.

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NG-GCI 1.16:

For the years 2007 – 2009, please provide the number of complaints that members of the GCI have received from Nicor Gas customers claiming that Nicor Gas has failed to provide an adequate timeframe for the customer to provide proper documentation for a medical certificate situation. For each complaint identified, please provide (a) the customer name, (b) address, (c) account number, (d) date the complaint was filed, and (e) when the complaint was resolved.

Response: Ms. Alexander has not undertaken an analysis of consumer complaints received by any member of GCI specific to the referenced testimony. Ms. Alexander's testimony is intended to recommend a generic rule that should be applicable to all utilities governed by Part 280 and is not a reflection of any particular utility's current practices. Ms. Alexander's experience notwithstanding, each member of GCI responds as follows:

CUB: Please see CUB's response to NG-GCI 1.02.

City: Please see the City's response to NG-GCI 1.02.

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NG-GCI 1.17:

For the years 2007 – 2009, please provide the number of complaints that members of the GCI have received from Nicor Gas customers claiming that Nicor Gas did not restore service within a 48 hour timeframe after the disconnection situation was remedied. For each complaint identified, please provide (a) the customer name, (b) address, (c) account number, (d) date the complaint was filed, and (e) when the complaint was resolved.

Response: Ms. Alexander has not undertaken an analysis of consumer complaints received by any member of GCI specific to the referenced testimony. Ms. Alexander's testimony is intended to recommend a generic rule that should be applicable to all utilities governed by Part 280 and is not a reflection of any particular utility's current practices. Ms. Alexander's experience notwithstanding, each member of GCI responds as follows:

CUB: Please see CUB's response to NG-GCI 1.02. Subject to and notwithstanding CUB's objections, CUB additionally responds that the referenced testimony did not allege that Nicor, specifically, makes a practice of taking more than two days to restore service. To find which complaint regarding reconnection times alleged that the reconnection took more than two day, a manual review of all complaints would be necessary. While CUB's database does have field called "Connection Delay," the "delay" is not coded as a particular length of time. Determining the exact length of delay could only be accomplished by reviewing the narrative portion of the complaint or the utility response - if there is one. Furthermore, like billing complaints, complaints regarding reconnection delays can be found embedded in a several concern fields: Billing Dispute, Pending Disconnection, Incorrect Disconnection, New Service Delay, Deferred Payment Arrangement, etc. Thus, a manual review of such complaints would be

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necessary to determine which complaints fall specifically within the scope of the referenced testimony.

City: Please see the City's response to NG-GCI 1.02.