

Illinois Commerce Commission
Response to City of Chicago First Data Request
to MidAmerican Energy Company
Docket No. 06-0703

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Date 5/25/11 Reporter [Signature]

2.5 Please refer to page 18, line 453 through page 20, line 557 of GCI Ex. 1.0, the Direct Testimony of Barbara R. Alexander. With regard to the 21 specific reporting requirements described at the referenced portion of Ms. Alexander's testimony, please identify which of these items is able to be reported or obtained from MidAmerican's current customer billing and accounting systems. Where such data as proposed is not available, please explain whether comparable data is available. Where data is not available, please provide the degree of difficulty or expense to obtain such information in the future. Please provide any documents related to your answers.

Response:

As MidAmerican pointed out in its rebuttal testimony, GCI's information reporting requirements are not clearly defined. MEC Ex. 2.0 at 48, Lines 1078-1079. To the extent the reporting requirements are simple and relate to MidAmerican's operations, MidAmerican has provided a response. Where data requirements are vague and not clearly defined, MidAmerican has provided an explanation of why the data is impractical to obtain. As MidAmerican indicated in its rebuttal testimony, the periodic reporting requirements proposed by Ms. Alexander are not going to produce consistent data from all the utilities due to size, and operational differences. These operational differences will render the data meaningless. MEC Ex. 2.0 at 48, Lines 1080-1082.

MidAmerican has addressed each data requirements in the list below. Please note that the numbering in Ms. Alexander's direct testimony is not sequential as noted below.

- 1. The average number of accounts receiving service (to obtain the annual average, sum the month-end totals and divide by 12);

MidAmerican could report this information from its current Customer Service System.

2. The number of new customer accounts established;

This requirement is vague and ambiguous and has practical limitations. It is not clear how a "new customer account" is defined. For example, if a customer is moving to a new location within MidAmerican's service territory, is that a new customer account? What if the customer is moving to a new location within MidAmerican's service territory, but outside of Illinois?

Without further clarification on how "new customer account" is defined and how that definition applies to how MidAmerican currently processes a new customer account or applications, this information is impractical to obtain. Consequently, MidAmerican cannot assess what cost impacts this vague reporting requirement may have.

3. The average length of time between a successful application for service and the activation of the customer's account;

This requirement is vague and ambiguous, and there is no way to accurately and consistently obtain this data. For example, a customer may request service activation two weeks in advance and the activation takes place on the date requested. The issue then becomes how is this request tracked? Is it reported as taking two weeks to activate service or is it considered to be a 24-hour activation since it met the customer's requested activation date?

Without further clarification on how "service activation" is defined and how that definition applies to how MidAmerican currently activates service, this information is impractical to obtain. Consequently, MidAmerican cannot assess what cost impacts this vague reporting requirement may have.

4. The number of accounts in which the customer's account was activated or established beyond 48 hours and the average length of time beyond 48 hours for those accounts;

This reporting requirement is similar to number 3, above. Without further clarification on how "service activation" is defined and how that definition applies to how MidAmerican currently activates service, this information is impractical to obtain. Consequently, MidAmerican cannot assess what cost impacts this vague reporting requirement may have.

5. The average customer bills per billing period and per year (divide the total residential revenues receivable by the number of bills issued);

MidAmerican could report this information. However, this requirement is unnecessary and redundant as revenue information can be obtained from the IL-Form 21, which MidAmerican files annually with the Illinois Commerce Commission. However, MidAmerican notes it is impractical to provide the average per billing period data without further clarification of what "per billing period" means in context with MidAmerican's billing procedures and billing cycles.

6. The average number of accounts with overdue amounts per billing period (an overdue amount is the amount billed to the customer that was not paid by the due date of the bill or by a date otherwise agreed upon);

This requirement is vague and ambiguous as "overdue amounts per billing period" is not clearly defined. For example, MidAmerican currently tracks overdue amounts, the number of customers past due and the average past due amount on a monthly basis. Without further clarification on how "overdue amounts per billing period" is defined and how that definition applies to how MidAmerican currently bills for service, this information is impractical to obtain. Consequently, MidAmerican cannot assess what cost impacts this reporting requirement may have.

7. The average dollar amount of overdue amounts per billing period;

As noted in number 6 above, this requirement is vague and ambiguous. Without further clarification on how "overdue amounts per billing period" is defined and how that definition applies to how MidAmerican currently bills for service, this information is impractical to obtain. Consequently, MidAmerican cannot assess what cost impacts this reporting requirement may have.

8. For those accounts with overdue amounts per billing period, the length of time over which the overdue amount accrued expressed as 31-60 days, 61-90 days, and over 90 days.

As noted in number 6 and 7 above, without further clarification on how "overdue amounts per billing period" is defined and how that definition applies to how MidAmerican currently bills for service, this information is impractical to obtain. Consequently, MidAmerican cannot assess what cost impacts this reporting requirement may have.

9. The number of disconnection notices issued per month;

MidAmerican could obtain and report this information from its current Customer Service System.

10. The number of disconnections for any reason other than at the request of the customer or the abandonment of the premises per month;

MidAmerican currently reports the number of residential customers disconnected for non-payment in the monthly Residential Disconnection/Reconnection Report that is submitted to the Commission. See Response in 2.4, above. MidAmerican does not currently track the specific reason for disconnection for other reasons, such as tampering and safety.

Without further clarification on how "abandonment" is defined and how that definition applies to how MidAmerican currently tracks disconnection, this information is impractical to obtain. Consequently, MidAmerican cannot assess what cost impacts this reporting requirement may have.

11. The number of residential reconnections following disconnection without consent per month (requests for service by new customers are excluded);

As noted in number 10 above and in question 2.4, MidAmerican reports reconnection after disconnection for non-payment monthly to the Illinois Commerce Commission. MidAmerican does not currently track the specific reason for

disconnection for other reasons, such as tampering and safety.

Without further clarification on how "disconnection without consent" is defined and how that definition applies to how MidAmerican currently tracks disconnection, this information is impractical to obtain. Consequently, MidAmerican cannot assess what cost impacts this reporting requirement may have.

12. The length of time expressed in 24-hour increments from the time that the customer remedied the reason for the disconnection until the customer was reconnected;

MidAmerican follows the disconnection/reconnection procedures outlined in Part 280 and in its tariffs on file and approved by the Illinois Commerce Commission. MidAmerican currently does not track how quickly reconnections occur, but does so in accordance with Part 280. Moreover, MidAmerican cannot fully answer the question without further clarification on what is meant by "remedied the reason for the disconnection." For example, a customer might make a payment at an authorized pay agent, but the utility would not know immediately. MidAmerican could make a system change to track the period of time from when the company was made aware of the payment and a reconnect order was entered until the time the order was completed, but would not be able to track from the time the payment was made.

Without further clarification on how "remedied the reason for the disconnection" is defined and how that definition applies to how MidAmerican currently processes reconnection orders, this information is impractical to obtain. Consequently, MidAmerican cannot assess what cost impacts this reporting requirement may have.

13. The number of residential reconnections following disconnection without consent per month where the service was placed in another person's name;

MidAmerican does not currently track the number of reconnects that follow a disconnection where service is placed in another person's name. Without further clarification on how "disconnection without consent" is defined and how that definition applies to how MidAmerican

currently tracks disconnection, this information is impractical to obtain. Consequently, MidAmerican cannot assess what cost impacts this reporting requirement may have.

14. The number of residential accounts that were disconnected without consent that year that were not reconnected prior to the start of the winter period (this number should not include accounts that were placed in another person's name);

MidAmerican reports this information to the Illinois Commerce Commission pursuant to 83 Il. Admin. Code 280.138.

(NOTE NUMBERING OFF)

10. The number of DPAs negotiated by type of DPA offered to its customers (e.g., regular, low income, medical, budget, special relating to winter rules);

MidAmerican could report this information from its current Customer Service System.

11. With regard to each type of DPAs for residential customers, the following information:

11 a) The number of DPAs that were completed;

MidAmerican could report this information from its current Customer Service System.

b) The number of DPAs that were renegotiated;

MidAmerican could report this information from its current Customer Service System.

c) The average down payment for a DPA; and

MidAmerican could report this information from its current Customer Service System.

d) The average length of the DPAs entered into expressed in months.

MidAmerican could report this information from its current Customer Service System.

12. The number of deposits requested and received and their average dollar amount;

MidAmerican could report this information from its current Customer Service System.

13. The number of applications for service that were denied and the reasons therefore;

This requirement is vague and ambiguous and has practical limitations. It is not clear how an "application for service" is defined. For example, if a current customer is moving to a new location within MidAmerican's service territory, but several months have passed since they had active service, are they considered an applicant or is that a new customer account? What if the customer previously lived in MidAmerican's service territory, but outside of Illinois? Additionally, as MidAmerican stated in its rebuttal testimony, this vague reporting requirement will mean something different to each utility. MEC Ex. 2.0 at 10, Lines 210-222. The end result is that consistent data is not going to be obtained from all utilities due to operational differences, and this renders the information meaningless.

Without further clarification on how "application" is defined and how that definition applies to how MidAmerican currently processes customer applications, this information is impractical to obtain. Consequently, MidAmerican cannot assess what cost impacts this vague reporting requirement may have.

14. The number of residential applications for service in which the utility demanded a deposit or payment arrangement for a prior unpaid debt as part of its application for service (after the request for service, but within 60 days);

This information is impractical to obtain. As noted above, it is unclear how "application for service" is defined. Does this apply to where an application for service was granted and service was activated? If so, then the time of year is relevant to whether a deposit or payment was entered into

as Part 280 requires that payment arrangements must be offered during the winter months. This data requirement is asking for three separate things. Without breaking the requirements out and clearly defining what specific information is sought within the context of MidAmerican's application process and the current Part 280 requirements for deposits and payment arrangement, there is no way to determine whether this information can be tracked and reported. Consequently, MidAmerican cannot assess what cost impacts this vague reporting requirement may have.

15. The number of medical certifications submitted to the utility and the number denied, if any, and the reasons therefore;

MidAmerican could report this information, but would require a manual process. If the amount of medical certifications increases, then MidAmerican would have to automate the process and cannot speculate on costs at this point in time.

16. The number of customer payments reported by each of the methods allowed or authorized by the utility to accept customer bill payments;

MidAmerican could report this information from its current Customer Service System.

17. The gross revenue received;

MidAmerican reports this information to the Illinois Commerce Commission in its annual IL Form 21.

18. The actual write off amounts and method used to ascertain those figures (and any other figures that reflect uncollectible amounts);

MidAmerican could report this information from its current Customer Service System.

19. The amount recovered from previously written off amounts and method used to ascertain those figures;

MidAmerican could report this information with no changes to its current Customer Service System.

20. The number of cases and dollar amount of unpaid debt pursued through the court system or other means, the costs of collection by each method; and

MidAmerican could track the costs of debt pursued through the court system manually. MidAmerican, however, cannot report the collection method done by a collection agency, as that information is proprietary to the collection agency.

Without further clarification on how "other means" is defined and how that definition applies to how MidAmerican's collection practices, this information is impractical to obtain. Consequently, MidAmerican cannot assess what cost impacts this vague reporting requirement may have.

21. The total number of customer disputes handled categorized by the following minimum categories:

- a) Request for deposit;**
- b) DPA terms and conditions;**
- c) Terms required to avoid disconnection of service;**
- d) Terms required to obtain reconnection of service;**
- e) Estimated bills;**
- f) Amount of bill; usage; calculation of bill**
- g) Line extensions**
- h) Medical Certifications**
- i) Other**

As MidAmerican stated in its response to question 2.3, for the purpose of this data request response, MidAmerican defines customer complaints as those customer complaints that escalate to the Illinois Commerce Commission Consumer Services Division. The Illinois Commerce Commission Consumer Services Division already reports this information in its annual report. The annual report provides a breakdown of complaint categories.

The Illinois Commerce Commission Consumer Services Division reports can be found at:

<http://www.icc.illinois.gov/reports/Results.aspx?t=7>