

Consumers Gas Company

Implementation Checklist

Part 280

Consumers Gas Company is a small rural area gas company. We have a small office staff of dedicated personnel working hard to ensure we are in compliance in every way. As stated in our cover letter, there are two main objectives that will have to be completed to be able to make all of this come together.

1. We have existing software that is going to require some major programming changes to be able to address many issues for the billing requirements. We have sent a work order to request a quote and timeline to have this complete. We are waiting on their response to see if they will be able to comply with the changes needed, their quote and timeline. We are also looking at alternative software and have requested. Once this is received we will determine if we will continue with this company or need to look for alternatives. As this is a key factor, we are unable to provide a better estimate of compliance dates. Once the program is updated, we can start entering data revisions for the customer accounts to get the bills generated correctly.
2. We currently do not have a website. As this will have to be developed from the ground up, rather than just adding to an existing site, it will take more time. Once quotes are received and reviewed, we will have a better idea of when we can be compliant.

Since we are a small company with limited staff, there may be unforeseen issues that could develop causing unanticipated delays. We will do everything in our power to work through these and get the steps complete, but hesitate to put an earlier date for compliance because of this. As a small company we know many of our customers on a first name basis. We try to do our best to work with any customer that comes to us with concerns.

Consumers Gas Company currently sends the bills out on a postcard. These will go out by full page letter once everything is implemented. We will need to purchase a folding and stuffing machine to handle this aspect of the process. We are investigating what is available and getting quotes.

Consumers Gas Company has every intention of being fully compliant by May 1, 2016. As the two items addressed above become developed, we will strive to complete the items that are addressed below as quickly as possible.

All items that are not listed below are in compliance.

Section 280.30 Application

The utility must make available on its website a full description of the utilities application process.

1. Consumers Gas Company will compile all information needed to be placed on the website.
2. Consumers Gas Company is going to contact multiple website developers and get quotes for varying types of websites.

3. Once quotes are received, Consumers Gas Company will select a provider and begin developing the website.

Compliant date: May 1, 2016

Rationale: Due to the fact that Consumers Gas Company currently does not have a website, all information has to be reviewed & approved. Cost will be provided upon receipt of quotes and final selection made.

Section 280.35 Revert to Landlord/Property Manager Agreements

The utility shall provide an example of its prearrangements form in the utilities tariff and maintain a copy of the form on its website.

- b) 1. The Landlord/Property Manager Agreement will be added to the Utilities Tariff
- 2. The Landlord/Property Manager Agreement will be placed on the website.

Compliant date: May 1, 2016

Rationale: Due to the fact that everything encompasses building and implementing the website Consumers Gas Company will not be able to complete this until the website is done.

Within two business days the company must notify the landlord/property manager that the service has been placed in the landlord/property manager's responsibility.

c) Currently we have the Landlord/Property Manager Agreement form giving us permission to put the property into the landlord's name. Within two business days Consumers Gas Company will call the number provided to inform landlord of this change.

Compliant date: February 1, 2015.

Section 280.50 Billing

Bill Content – Bills rendered to a retail customer for service regardless of bill delivery method shall be itemized to clearly show at least the following.

c. Currently, Consumers Gas Company uses postcard billing and there are several changes that must be made through a program change through a software computer service. The changes that have to be added are: (c) (1) (E), (c) (1) (F), (c) (1) (G), (c) (1) (H), (c) (1) (I), (c) (2) (B), (c) (2) (C), (c) (3) (A), (c) (3) (G), (c) (3) (H), (c) (5) (C) (ii), (c) (7).

Compliant date: May 1, 2016

Rationale: Consumers Gas Company has sent a request for quote to our current computer software company. Consumers Gas Company is waiting on them to provide a quote and estimated time frame for implementation. Consumers Gas Company will have this implemented by May 1, 2016. Depending on information received, Consumers Gas Company may have to look for an alternative software program.

Once programing is determined, new equipment will need to be purchased to handle printing, folding and stuffing the bills.

The utility's toll free phone number and/or home number for customer inquiries and complaints; the toll free telephone number for the Commission's Consumer Services Division and a statement indicating that the customer must contact the utility first before seeking assistance from the Commission's Consumer Services Division

c. 2. A & B Contact information will be added to the bill for Consumers Gas Company and a statement advising customers that they need to call Consumers Gas Company, before contacting the Commission's Consumer Services Division. The Commission's Consumer Services Division phone number will be added.

Compliant date: May 1, 2016

Rationale: This is an item that will be added to the software.

Customers may choose to have bills delivered by electronic means.

d. 3. Consumers Gas Company currently does not deliver by electronic form. Consumers Gas Company will develop a form for the customer to authorize Consumers Gas Company to send their bill electronically.

Compliant date: May 1, 2016

Rationale: This is an item that will be added to the software.

Bills for utility service sent through the U.S. Mail shall be in envelopes to ensure privacy.

d. 1. The bills are currently on postcard form. This will be changed with the new software. Then, this can be added to the tariff and website.

Compliant date: May 1, 2016

Rationale: Date will be determined after software and website is approved, and implemented.

Customers may choose to have bills delivered by electronic means.

d. 3. Consumers Gas Company currently does not deliver by electronic form. Consumers Gas Company will develop a form for the customer to authorize Consumers Gas Company to send their bill electronically.

Compliant date: May 1, 2016

Rationale: This is an item that will be added to the software.

If bills are delivered or made available to customers by means other than U.S. Mail, the utility shall maintain a record to verify each bill delivery or issuance for two years.

d. 4. Currently Consumers Gas Company hand delivers bills to three customers. This will be documented and kept on record for 2 years.

Compliant date: April 1, 2015

Rationale: A form will be developed and approved.

Each utility shall have an example of its bill form in its tariffs on file with the Commission and on its website.

g. Consumers Gas Company will add a copy of our billing to the Utilities Tariff and on the website.

Compliant date: May 1, 2016.

Rationale: A copy of the bill will not be available until the software is complete. Once this is done, it will be added to the website, provided it is up and running by then.

Section 280.60 Payment

The utility shall provide information about methods of payments on the utilities website and in the customer information packet.

b. 1. This information will be provided once the website is developed and the Customer Booklet is revised.

Compliant date: May 1, 2016

Rationale: Pending Website implementation.

The utility's bill to the customer shall advise the customer how to obtain information on the available payment methods.

b. 2. This will be added to the bill.

Compliant date: May 1, 2016

Rationale: Pending Software implementation.

Late fees for units of State government shall be assessed according to the State Prompt Payment Act [30ILCS 540].

d. 6. Late fees for State, County, & Local Government will be implemented to reflect a 45 day late fee.

Compliant date: May 1, 2016

Rationale: Pending Software implementation.

280.65 Late Payment

Waiver: A low income customer shall not be assessed late payment fee while he or she is qualified as a low income customer.

a. Once a customer is designated as a low income customer, this will be entered into the software to discontinue late fee charges.

Compliant date: May 1, 2016

Rationale: Pending Software implementation.

New Qualification: When a customer is qualified as a low income customer, the utility shall not be obliged to waive late fees that were assessed prior to qualification.

b. Customer will still owe late fees from prior service, before discontinuing late fees.

Compliant date: May 1, 2016

Rationale: Pending Software implementation.

Expiration of Qualification: If a customer is not re-qualified as a low income customer, then the utility may begin assessing late fees on past due amounts.

c. The customer will need to requalify each year to avoid late fees.

Compliant date: May 1, 2016

Rationale: Pending Software implementation.

Section 280.80 Budget Payment Plan

If the budget payment plan amount must be altered, the utility shall notify the customer of the change in writing.

g. 2. The customer will be notified in writing of any changes.

Compliant date: May 1, 2016

Rationale: Pending Software implementation.

Section 280.90 Estimated Bills

A bill based upon an actual reading shall indicate that the meter reading figure is an actual reading.

f. 2. Currently if the meter is read, the bill does not have a code to reflect this. The bills have an E behind the meter reading for estimate readings. This will be changed to reflect type of reading, A-actual or E-estimate being done.

Compliant date: May 1, 2016

Rationale: Pending Software implementation.

Section 280-100 Previously Unbilled Service

Itemization. Any amount attributed to previously unbilled service shall be labeled as such on the customer's bill and include the beginning and ending dates for the period during which the previously unbilled amount accrued.

c. A section will be added to the bill to reflect these balances

Compliant date: May 1, 2016

Rationale: Pending Software implementation.

Section 280-110 Refunds and Credits

No Changes

Section 280.120 Deferred Payment Arrangements

Bill Itemization. Each bill rendered to a customer who has established a DPA with the utility and has not defaulted shall include the following information: total balance remaining on the DPA, the amount of the installment, the number of remain installments on the DPA and a statement of penalty for defaulting,

e. All information required will be added to the bill.

Compliant date: May 1, 2016

Rationale: Pending Software implementation.

If a DPA defaults and is not reinstated prior to the next bill statement, the utility shall notify the customer of the default.

2. This is done by live phone call. If no one is reached, a letter will be mailed.

Compliant date: April 1, 2015

Default: A utility may consider a DPA in default when a customer fails to pay the full amount of the installment and the current bill by the second day after the bill due date.

i. 1. This will be implemented once 280.60 Payment section is implemented

Compliant date: May 1, 2016

Rationale: Pending Software implementation.

Section 280.130 Disconnection of Service

Disconnection Notice Content: Utility disconnection notices shall conform with Appendices A, B, and D and shall include at least: Medical certification process and customer bill of rights in Appendix b.

d. 7. Consumers Gas Company will insert Appendix B with disconnect notices.

Compliant date: July 1st, 2015

If the utility and customer have agreed to electronic communications, a utility shall submit a duplicate notice to the customer electronically as long as it has also mailed or hand delivered a paper version of the notice to the customer.

e. 4. Consumers Gas Company will mail and send electronically disconnect notices to customers that have agreed to electronic communications.

Compliant date: May 1, 2016

Rationale: Pending Software implementation.

Third Party Notice: A customer may designate, by written request to the utility, that a third party will be sent or delivered a duplicate notice whenever a disconnection notice is sent or delivered to the customer.

f. Third party notice will be addressed in the software.

Compliant date: May 1, 2016

Rationale: Pending Software implementation.

Timing of notice: Effective date: The utility shall not disconnect service until at least 10 days after sending or delivery of the notice to the customer.

g. 2. The disconnect date on the disconnect notice will be changed to 10 days after sending the notice.

Compliant date: February 1, 2015.

Warning Call to Residential and Master-Metered Customers: Unless the customer has no phone number on record, the utility shall provide a warning call to the customer a minimum of 48 hours prior to the scheduled disconnection.

j. 1. Consumers Gas Company will contact every customer prior to disconnect at least 48 hours prior to the scheduled disconnect.

Compliant date: June 1, 2015

The warning call may be live or automated, and it shall advise the customer of the utility's intent to disconnect the service. A second call shall be required 24 hours prior to the scheduled disconnection if the first call does not reach a person or an answering machine.

j. 2. If no one is reached by phone or answering machine a second call will be placed 24 hours prior to disconnect.

Compliant date: June 1, 2015

Holiday Limits: A utility shall not disconnect a customer on a State of Illinois or utility holiday, or after noon on any day preceding a State of Illinois or utility holiday, unless the utility is prepared to take the customer's payment and reconnect the customer that same day if the customer remedies the reason for disconnection.

l. 5. Consumers Gas Company will not disconnect a customer on any State of Illinois Holiday.

Compliant date: January 1, 2015

Section 280.135 Winter Disconnection of Residential Heating Services, December 1 through March 31

No Changes

Section 280.140 Disconnection for Lack of Access to Multi-Meter Premises

No Changes

Section 280.150 Disconnection of Master-Metered Apartment Buildings

Consumers Gas Company does not have any Master-Metered Apartment Buildings

Section 280.160 Medical Certification

Medical Payment Arrangement: If valid medical certification is received prior to disconnection, the first bill statement that will be due after 30 days after the certification date shall indicate: amount due, remaining balance, that it is MPA, remaining installments and equal amounts to be paid.

i. 1. Medical Payment Arrangement: This information will be added to the bill.

Compliant date: May 1, 2016

Rationale: Pending Software implementation.

Medical Payment Arrangement: If valid medical certification is received after disconnection, the first bill statement that will be due after 30 days after the certification date shall indicate: amount due, remaining balance, that it is a MPA, remaining installments and equal amounts to be paid.

i. 2. This information will be added to the bill.

Compliant date: May 1, 2016

Rationale: Pending Software implementation.

Section 280.170 Timely Reconnection of Service

No Changes

Section 280.180 Reconnection of Former Residential Customers for the Heating Season

No Changes

Section 280.190 Treatment of Illegal Taps

No Changes

Section 280.200 Tampering

Record Keeping: The utility shall document and record the evidence that proves the tampering, and shall save the full evidence proving the tampering for a minimum of three years from the date the customer is issued a corrected bill for tampering.

g. Record Keeping, tampering. Pictures and documentation will be kept for 3 years.

Compliant date: January 1, 2015

Section 280.205 Non-Residential Tampering

No Changes

Section 280.210 Payment Avoidance by Location

In compliance 12-19-14

Section 280.220 Utility Complaint Process

All customer complaints must be assigned a complaint number that shall be retained by the utility for two years.

j) Complaints will be assigned a complaint number. Resolution will be documented and kept on file for two years.

Compliant date: February 1, 2015

Section 280.230 Commission Complaint Process

No Changes

Section 280.240 Public Notice of Commission Rules

Each utility shall provide notice to customers of the availability of Commission Rules.

This will be posted on the website. A notice will be on the bills once a year.

Compliant date: May 1, 2016

Rationale: Will be complete once website is up & running.

Section 280.250 Second Language Requirements

No Changes

Section 280.260 Customer Information Packet

The utility shall develop customer information material and provide the material to customers without additional charge.

a. The current Customer Information Packet will be revised to include updated information, and reprinted.

c. 1, 2, 4.

Compliant date: January 1, 2016

Material available on any utility web site.

c. 3. Consumers Gas Company will add to the Website once up and running.

Compliant date: May 1, 2016

Rationale: Pending Software implementation.

Filing with the Commission: The material shall be kept current and a current copy shall be filed with the Manager of the Consumer Services Division

d. Once the book is completed the book will be filed with the Consumer Services Division.

Compliant date: November 15, 2015