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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

DOMINION ENERGY UTAH'S INTEGRATION PROGRESS REPORTS FOR 2018	Docket No. 18-057-09 DOMINION ENERGY UTAH'S REPLY COMMENTS
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Pursuant to the Notice of Filing and Comment Period issued on January 4, 2019 in the above-referenced docket, Questar Gas Company dba Dominion Energy Utah (Dominion Energy Utah or Company) respectfully submits these Reply Comments.

On January 4, 2019, Dominion Energy Utah filed its Third Quarter 2018 Integration Progress Report. On January 4, 2019, the Commission issued the Notice of Filing and Comment Period requiring any comments to be filed by Monday, February 4, 2018, and any reply comments to be filed by Monday February, 18, 2019.

On February 4, 2019, the Utah Division of Public Utilities (Division) filed its Action Request Response (Division's Response) in this docket finding that "the Company has materially met its requirement to report to the Commission its merger progress as required in paragraph 36 of the Stipulation and no action is requested or required of the Commission." The Company agrees with these findings and recommendations.

The Division also offered commentary related to the customer service metrics, and observed that “The corrective measures for customer services matrix are a few months behind and the transponder replacement program has fallen a year behind.” The Division specifically made note of the staffing of the Customer Care department and the completion of the transponder replacement program. In response, the Company offers additional information about the staffing and timeline concerns, as well as its plans to address the deficient customer service metrics.

First, the Company is working to fully staff the Customer Care department. The Company was understaffed in 2018 and has been replacing those lost positions. As the Company explained in Exhibit 38 of the Third Quarter Integration Progress Report, the average rate of attrition in the Customer Care department YTD in 2018 was 23.2% compared to 12.9% in 2017. With unemployment at record lows in Utah, the Company has encountered greater competition in the labor market and hiring and retaining employees is increasingly difficult. The problem compounds when vacancies open up in other areas of the Company and employees in the Customer Care department apply to fill those vacancies in order to achieve career progression within the Company. Given these challenges the slight dip in the customer care standards is reflective of understaffing that is, to a great extent, beyond the Company’s control.

Current data evidences this fact. In the fourth quarter of 2018 some of these vacancies were filled and the 4th quarter results show improvement in these metrics in spite of the fact that many of the Customer Care employees are new and are progressing through a learning curve. The table below highlights the customer care metrics that were discussed by the Division and shows that in the 4th quarter the

results have improved.

Metric	3 rd Quarter 2018	4 th Quarter 2018
Customer Care #1 – Percentage of calls answered in 60 seconds	78.4%	83.1%
Customer Care #3 – Wait time after menu selection	124 seconds	88 seconds
Customer Care #4 – Callers that hang up after menu choice	3.3%	2.2%
Customer Care #5 - Time spent with each caller	5.2 minutes	5.1 minutes

This improvement is encouraging; especially considering that the 4th quarter typically has a higher call volume because of cold weather. These metrics should continue to improve as the Company increases staff within the Customer Care department.

In its Response, the Division also correctly noted that in the Company’s Second Quarter Integration Progress Report indicated that the transponder replacement program “is scheduled to be complete in 2019.” The quoted language is erroneous. The Company’s Second Quarter Integration Progress Report should have indicated an anticipated completion date of 2020. On January 9, 2018, in Docket 17-057-05, the Company held a technical conference and explained to the Commission that it planned to complete the transponder replacement program in 2020. That proposed completion timeframe has not changed. A copy of the January 9th presentation can be found at <https://pscdocs.utah.gov/gas/17docs/1705705/298914DEUCustSatStanPres1-9-2018.pdf>. On slides 16 and 17 of this presentation the Company provided an up to date installation schedule which showed a 2020 completion date. The Company is working towards

completing this schedule and is focusing first on the areas with the lowest reply rates.

The Company appreciates the opportunity to offer additional information and clarification in reply to the Division's Response and agrees with the Division that the Commission need take no further action at this time relating to the Integration Progress Report.

RESPECTFULLY SUBMITTED this 18th day of February, 2019.

DOMINION ENERGY UTAH



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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of Dominion Energy Utah's Reply
Comments was served upon the following persons by e-mail on February 18, 2019:

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