

-
-
-

23-06007

Public Utilities Commission of Nevada
Electronic Filing

Submitted: 9/25/2023 1:48:11 PM

Reference: 430fdc34-5f00-49e7-990e-599079babd49

Payment Reference: e7-990e-599079babd49

Filed For: Staff Counsel Division

In accordance with NRS Chapter 719,
this filing has been electronically signed and filed
by: /s Jenna Styles

By electronically filing the document(s),
the filer attests to the authenticity of the electronic signature(s) contained therein.

This filing has been electronically filed and deemed to be signed by an authorized
agent or
representative of the signer(s) and
Staff Counsel Division

PUBLIC UTILITIES COMMISSION OF NEVADA
Docket Nos. 23-06007, 23-06008
Phase 2: Revenue Requirement

Prepared Direct Testimony of
Anne-Marie Cuneo on behalf of the
Regulatory Operations Staff

1
2
3
4
5
6 **1. Q. Please state your name, occupation, and business address.**

7 A. My name is Anne-Marie Cuneo. I am the Director of Regulatory Operations for the
8 Regulatory Operations Staff (“Staff”) of the Public Utilities Commission of Nevada
9 (“Commission”). My business address is 1150 East William Street, Carson City,
10 Nevada 89701.

11 **2. Q. Does Attachment AMC-1 summarize your professional background?**

12 A. Yes, it does.

13 **3. Q. What is the purpose of your testimony?**

14 A. The purpose of my testimony is to provide, and offer support for, various
15 recommendations regarding the revenue requirement in the Application of Nevada
16 Power Company d/b/a NV Energy (“Nevada Power” or the “Company”) for authority
17 to adjust its annual revenue requirement for general rates charged to all classes of
18 electric customers and for relief properly related thereto. Specifically, I make
19 recommendations concerning Nevada Power’s customer service quality, costs for
20 customer service contractors, and costs inappropriately included in this case which
21 should have been recorded in the Natural Disaster Protection Plan (“NDPP”)
22 regulatory asset.

23 **4. Q. What are your recommendations to the Commission regarding the issue(s)**
24 **outlined in Q&A 3?**

25 A. I recommend that the Commission:

- 26 1) At a minimum, deny recovery of \$660,000 of the costs of Nevada Power’s
27 customer service contract with Active TeleSource to reflect the poor quality of
28 service its customers received during the test period; and

1 2) Deny recovery of \$517,791 from the revenue requirement to remove
2 Miscellaneous Distribution Expense that were incorrectly requested in this
3 docket that were disallowed as a regulatory asset in the NDPP docket.

4 **5. Q. Does the fact that you do not address any specific issue or position presented by**
5 **the Company indicate or imply Staff’s support?**

6 A. No, it does not. The fact that an issue is not addressed by Staff herein or in related
7 filings should not be interpreted as an agreement with, endorsement of, or consent to
8 any issue or position.

9
10 **I. Recommendation No 1: The Commission should, at a minimum, deny recovery of**
11 **\$660,000 of the costs of Nevada Power’s customer service contract with Active**
12 **TeleSource to reflect the poor quality of service its customers received during the test**
13 **period.**

14
15 **6. Q. When did Staff become particularly concerned about Nevada Power’s customer**
16 **service levels?**

17 A. Staff’s internal tracking of customer service complaints showed a sharp increase in
18 Nevada Power customer complaints and, in fact, they more than doubled in 2022.¹
19 Additionally, Docket No. 23-03036 was opened as an informational filing regarding
20 the 2022 Annual Service Quality and Metrics report of Nevada Power and Sierra
21 Pacific Power Company d/b/a NV Energy (“Sierra” and together with Nevada Power,
22 “Companies” or “NV Energy”). In that report, Staff noticed that there were disturbing
23 statistics regarding Nevada Power’s quality of service in 2022.

24 **7. Q. Please explain what your Attachment AMC-2 shows.**

25 A. In general, Staff tracks the number and type of complaints for each of the companies
26 regulated by the Commission. Attachment AMC-2 is a spreadsheet that shows, on the
27

28

¹ See Attachment AMC-2, which is a Staff spreadsheet of Company complaints for the years 2018 through 2022.

1 top portion, the number of complaints reported by Nevada Power and Sierra
2 compared to the number of complaints that Staff sends over to the Companies for
3 resolution. There is usually a small difference between the two reports, but every
4 month Staff's numbers are checked against the number of complaints that are reported
5 by the Company, and the two reports are usually within 10 complaints of each other.
6 The second section, labeled "In House" shows the number of complaints received by
7 the Consumer Complaint Resolution Division ("Consumer Division") that are handled
8 by Staff without sending them to the Company; thus, the "Totals" in that section
9 consist of the total number of Company complaints that are handled by Staff for each
10 applicable year.

11 **8. Q. Does Nevada Power track its own customer complaints that are resolved without**
12 **involving the Commission Consumer Complaint Resolution department?**

13 A. Apparently not. Staff requested in a Data Request ("DR") the number of complaints,
14 by type and month, for the past three years and received spreadsheets that essentially
15 mimic the reports that are compiled by the Staff Consumer Division.² Additionally,
16 the metric reported in Docket No. 23-03036 is "Number of Staff handled
17 Complaints,"³ which only includes the consumers that escalate their complaint to
18 Staff's Consumer Division for resolution. This leads me to conclude that Nevada
19 Power doesn't separately track its internally resolved complaints.

20 **9. Q. What specific service issues were noted for Nevada Power in 2022?**

21 A. Staff was quite concerned about the metrics reported regarding "Cumulative Service
22 Level" and the "Abandoned Calls Percentage" in Docket No. 23-03036. According to
23 the Company, its Cumulative Service Level declined by 18 percent, from 80.6 percent
24 in 2021 to 62.5 percent in 2022. Even more importantly, the Company reported that
25 the percentage of Abandoned Calls skyrocketed in 2022 to 30 percent, up from 7
26

27 ² See Attachment AMC-3, which is Nevada Power's response to Staff DR 264 and a printout of the attached
28 spreadsheet for the year 2022.

³ See Docket No. 23-03036, NV Energy 2022 Service Quality & Metrics Report at 20.

1 percent in 2021.⁴

2 **10. Q. Did Staff question the reasons behind these declines in service quality?**

3 A. Yes, in Docket No. 23-03036 Staff requested further information regarding the
4 significant increases in abandoned call percentage and turnover. The Company's
5 response stated, in part, "A big part of the 2022 attrition occurred at Active
6 TeleSource, our outsource call center."⁵ Staff also sought further enlightenment
7 regarding Nevada Power's customer service metrics filed in MDR 96-E regarding
8 percentage of calls answered within 30 seconds and its abandoned call percentage.⁶ In
9 its responses Nevada Power also stated, in part, that the root cause was customer
10 service agent attrition coupled with inexperienced new agents. However, Nevada
11 Power did not respond completely to each of those questions and Staff needed to issue
12 further discovery to confirm that Nevada Power had performed no further analysis.⁷

13 **11. Q. Are the costs of the Active TeleSource contract being requested for recovery in
14 rates in this case?**

15 A. Yes, Nevada Power is requesting recovery of approximately \$2.2 million dollars for
16 this consultant annually.⁸ This is problematic for Staff since the quality of service that
17 ratepayers paid for during the test period, particularly from this subcontractor, fell far
18 short of what should be reasonably expected from Nevada Power.

19 **12. Q. What are the tools that the Commission has to encourage Nevada Power to
20 increase its performance regarding customer service?**

21 A. The Commission has limited ability to directly influence Nevada Power's customer
22 service quality. The tools at the Commission's disposal are generally: to use customer
23 service as a factor to adjust the Company's Return on Equity, disallow certain costs
24 relating to the customer service issue, or order an investigation into the issue which
25

26
27 ⁴ *Id.* at 7-8.
⁵ See Attachment AMC-4, Nevada Power's response to Staff-01 in Docket No. 23-03036.
28 ⁶ See Attachment AMC-5, Nevada Power's responses to Staff DRs 265, 266 and 267.
⁷ See Attachment AMC-6, Nevada Power's responses to Staff DRs 322, 323, and 326.
⁸ See Attachment AMC-7, Nevada Power's response to Staff DR 319.

1 could result in directives requiring the Company to report on or implement specific
2 solutions to resolve the issue identified. However, Nevada Power has the ability to
3 request Alternative Ratemaking Plans and Performance Based Rates pursuant to NRS
4 704.761 through 704.7622 and the temporary regulation, LCB File T002-23P from
5 Docket No. 19-06008. This process would be an ideal method for targeting specific
6 areas for improvement with corresponding rewards or consequences, and I would
7 encourage Nevada Power to consider this avenue to make improvements.

8 Unfortunately, Nevada Power has not chosen to avail itself of this type of ratemaking
9 and there does not seem to be a way for the Commission to require it to do so.

10 **13. Q. What are you recommending to encourage Nevada Power to put more focus on**
11 **customer service issues?**

12 A. I am recommending that the Commission disallow 30 percent of the costs of Active
13 TeleSource from recovery in rates. I make this recommendation based on the fact that
14 Active TeleSource is contracted to provide customer service as an outside call center
15 and the fact that 30 percent of the calls to the customer service department were
16 abandoned. That implies that, at a minimum, 30 percent of customers were effectively
17 denied prompt service during the test period. It is unreasonable to expect customers to
18 pay for a contract that effectively only provided 70 percent of the services it was
19 contracted to provide.

20 **14. Q. Are there other quality of service recommendations Staff would like to propose?**

21 A. Yes, in fact, there are. First, while Staff tracks the types of complaints by company, it
22 does not subdivide those complaints further. However, over the past year Staff has
23 seen a trend of Nevada Power customers being frustrated with the lack of information
24 that they are provided by the Company. For example, many of Nevada Power's new
25 customer service representatives are unable to explain what the dockets being
26 considered before the Commission are requesting, or what the potential impact is to
27 those customers. Staff is noticing that many of those callers are told to call the
28 Commission's Consumer Division to get an explanation of the cases before the

1 Commission. The Company should be able to communicate to its own customers
2 about the dockets that is has filed with the Commission. I recommend that Nevada
3 Power include, both in its training of its new employees and as needed for its seasoned
4 call center employees, talking points regarding the filings that have been made at the
5 Commission for each and every case. Staff understands that Nevada Power has had
6 significant turnover in its customer service department, but believes that additional
7 training should be provided so that customers who call about filings at the
8 Commission do not have to make a separate call to Staff to get this information.
9 Second, as discussed previously, during discovery Staff became aware that Nevada
10 Power does not track customer complaint calls that come in and are handled internally
11 by its customer service representatives. This seems like a metric that should be
12 tracked and used in any analysis of customer service or benchmark metrics. Third,
13 Staff discovered that Nevada Power doesn't track the amount of time that a customer
14 spends in its Interactive Voice Response ("IVR") system.⁹ This metric would be a
15 good one for the Company to begin to track in order to be able to more fully
16 understand how long customers spend in the system and how successful its IVR
17 system is at satisfying its customers' needs. Finally, Staff has noticed that when it
18 provides Nevada Power customers with a three-year chart/spreadsheet of the
19 customer's usage, it often helps the customer understand the problem or issue they
20 inquired about more clearly. Nevada Power should offer to provide its customers with
21 that information, for example, when high bill complaints are received.

22 **15. Q. What is your recommendation with regards to the recovery of the costs**
23 **associated with the customer service contract with Active TeleSource ?**

24 A. I recommend that the Commission deny recovery of \$660,000 of the costs of Nevada
25 Power's customer service contract with Active TeleSource to reflect the poor quality
26 of customer service during the test period.

27
28

⁹ See Attachment AMC-8, Nevada Power's response to Staff DR 320.

1 **II. Recommendation No 2: Deny recovery of \$517,791 from the revenue requirement to**
2 **remove Miscellaneous Distribution Expenses that were incorrectly requested in this**
3 **docket that were previously disallowed as a regulatory asset in the NDPP docket.**
4

5 **16. Q. How did Staff determine that the costs in Federal Energy Regulatory**
6 **Commission (“FERC”) Account No. 588 were inflated?**

7 A. Staff issued discovery based on its use of the HData software which assists regulatory
8 bodies in analyzing public FERC data.¹⁰ Staff reviewed some of the accounts which
9 had large variances in expenditures in 2022 in Nevada Power’s FERC Form 1 and
10 questioned the reasoning behind those increases.¹¹

11 **17. Q. Did Nevada Power acknowledge that the FERC Account No. 588 costs that were**
12 **included in the revenue requirement were incorrectly included?**

13 A. Yes. Staff appreciates Nevada Power’s forthrightness in acknowledging that the
14 miscellaneous distribution costs associated with NDPP were inappropriately included
15 in the revenue requirement, and, instead, were disallowed as a regulatory asset in the
16 NDPP docket.

17 **18. Q. What is your recommendation regarding Miscellaneous Distribution Expenses?**

18 A. I recommend that the Commission deny recovery of \$517,791 from the revenue
19 requirement regarding Miscellaneous Distribution Expenses that were inappropriately
20 included in FERC Account No. 588, and that were disallowed as a regulatory asset in
21 the NDPP docket.

22 **19. Q. Please summarize your recommendations.**

23 A. The Commission should:

- 24 1) Deny recovery of \$660,000 of the costs of Nevada Power’s customer service
25 contract with Active TeleSource to reflect the poor quality of service its
26

27 ¹⁰ Staff utilizes a software created by HData. HData is a software company that is digitizing the entire regulated
28 energy industry by automating access to critical analytics for electric, oil, and gas companies and their regulators. HData
has also automated Federal filings and created the first energy regulatory app marketplace, <https://www.hdata.us/>.

¹¹ See Attachment AMC-9, Nevada Power’s response to Staff 291, Part A.

1 customers received during the test period; and

- 2 2) Deny recovery of \$517,791 from the revenue requirement to remove
3 Miscellaneous Distribution Expense that were incorrectly requested in this
4 docket that was disallowed as a regulatory asset in the NDPP docket.

5 **20. Q. Does this conclude your testimony?**

6 A. Yes, it does.

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

STATEMENT OF QUALIFICATIONS
OF
ANNE-MARIE CUNEO

EXPERIENCE

Public Utilities Commission of Nevada, Carson City, Nevada

Director of Regulatory Operations, 2009-present

Supervises and manages all aspects of the Regulatory Operations Staff, consisting of five technical divisions and Staff Counsel's office, who appear and participate in cases before the Commission as an independent party, balancing the interests of ratepayers and utility shareholders. Responsible for managing Staff resources to craft timely completion of analyses, preparation and defense of expert testimony on complex issues, comments, reports and other filings to the Commission. Determines, prepares and presents Staff policy positions in proceedings before the Commission. Provides support to the Commission for legislative hearings and inquiries. Negotiates settlements between multiple parties on behalf of Staff. Develops and communicates Commission administrative and policy direction to Staff. Monitor public utilities' compliance with applicable Nevada Revised Statutes, Commission regulations, and Commission orders.

Manager, Resource and Market Analysis Division, 2004-2009

Supervised and oversaw the duties performed by the Resource and Market Analysis Division Staff. Directed Division assignments and reviewed all briefing memos and written testimony submitted to the Commission, ensuring accuracy and consistency with existing Commission policy, Nevada Revised Statutes, and Commission regulations. Analyzed and rebutted other parties' written and oral testimony. Led technical investigations and provided technical interpretations of statutes and regulations. Conducted economic analyses of electric, natural gas, telecommunications, and water utilities applications, petitions, rate and tariff changes, plans and reports. Provided written testimony as an expert witness and orally defended testimony for proceedings brought before the Commission.

Regulatory Economist, 1999-2004

Conducted economic analyses of: electric, natural gas and local telephone utility performance; rate designs; Certificates of Public Convenience and Necessity applications; merger and competitive issue reviews; interconnection agreements; and other tariff reviews, including compliances. Provided information to the public and crafted regulations regarding installation of renewable facilities, participation in the renewable portfolio standard and subsidy programs. Prepared briefing memos providing the results of Staff investigations and its recommendations to the Commission. Provided written testimony as an expert witness and orally defended testimony for proceedings brought before the Commission. Developed, tracked, and issued renewable energy credits to be used for renewable portfolio standard compliance.

Senior Utility Analyst, 1998-1999

Performed reviews and analyses of tariff and rate filings for electric gas, LPG, telephone, and sewer and water utilities. Provided technical interpretations of tariffs, codes, and Commission regulations. Created and provided timely updates to utility data in the Utilities Database and Docket Tracker. Prepared briefing memos providing the results of Staff investigations and its recommendations to the Commission.

Flamingo Hilton Reno, Reno, Nevada

Casino Analyst

Conducted complex statistical analysis of all areas related to gaming and hotel management. Managed and updated AutoCAD map of casino floor and coordinated with engineering and security to keep map up-to-date. Monitored machine operations. Monitored data and revised pattern flow of slot machines to optimize casino returns. Reported gaming control regulations compliance information to the Nevada Gaming Control Board. Coordinated and hosted marketing and casino events.

University of Nevada, Reno, Reno, Nevada

Instructor on Letter of Appointment

Taught introductory and upper level undergraduate courses in economics, including Introductory Microeconomics, Introductory Macroeconomics, Intermediate Price Theory and Intermediate Income Theory.

EDUCATION

Master of Science in Economics

University of Nevada, Reno, 1997

Bachelor of Science in Business Administration

University of Nevada, Reno, 1994

PROFESSIONAL ACTIVITIES & MEMBERSHIPS

Western Renewable Energy Generation Information System: WREGIS Committee Member

State/Provincial Representative - since its inception. The Western Renewable Energy Generation Information System (WREGIS) is an independent, renewable energy tracking system for the region covered by the Western Electricity Coordinating Council (WECC). WREGIS tracks renewable energy generation from units that register in the system by using verifiable data and creates renewable energy certificates (RECs) for this generation.

NARUC Rate Design Subcommittee: Helped in drafting and preparing the “NARUC Manual on Distributed Energy Resources Rate Design and Compensation”, November 2016

American Economic Association, Member

PUBLICATIONS

Anne-Marie Bellard, *The Role of Entrepreneurship in Reconstructing the Russian Economy*, University of Nevada Press, 1997.

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO: 23-06007 **REQUEST DATE:** 08-17-2023
REQUEST NO: Staff 264 **KEYWORD:** MDR 96E/Operational
Performance Metrics
REQUESTER: Cuneo **RESPONDER:** Rose, Jennifer (NV Energy)

REQUEST:

Reference: MDR-96E

Question: Please provide:

- A) the number of Disconnections by month, for the past 3 years.
- B) the number of Re-connections by month, for the past 3 years.
- C) the number of complaints, by type, by month, for the past 3 years.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: Four (Zipped)

RESPONSE:

Spreadsheets attached for A) B) C)

CUSTOMER CONTACT SYSTEM (CCS) CATEGORY - REASON		PUCN Informal	PUCN Formal	PUCN Inquiry	PUCN Referral
ACCOUNT INFO					
	Current Info - IVR	6	0	0	0
	Current Info - Web	3	3	0	0
	Mailing Address / Premise Address	0	0	0	0
	Name Change Issue	0	0	0	1
	AB 405	0	0	0	0
	Energy Storage	0	0	0	0
	Solar	47	1	0	7
	Rates	7	0	0	5
	Covid 19	0	0	0	0
BILLING					
	Budget Billing (EPP)	21	2	0	2
	Estimated Bill (No Access)	1	0	0	1
	High Bill - AMIHI	87	7	0	17
	High Bill - Gas	1	0	0	0
	High Bill - Solar	26	0	0	4
	Identification Panel Problem	3	0	0	0
	Incorrect Rat - Non-Residential	0	0	0	0
	Incorrect Rate - Residential	0	0	0	1
	NV Dynamic Pricing (NDPT)	0	0	0	0
	Net Metering	0	0	0	0
	No Bill	5	0	0	0
	Time of Use (OTOU)	3	0	0	0
CLOSE SERVICE					
	Deposit / Credit Balance Refund	3	1	0	1
	Final Bill Dispute	15	1	0	3
	Move Out	3	0	0	1
DELINQUENT					
	Defaulted Payment Arrangement	2	0	0	0
	Deposit Issue	4	0	0	2
	Deposit Assessed (Late Pymt)	8	0	0	0
	Deposit Adverse Credit	0	0	0	0
	DNP (Disc Non Payment)	58	2	0	15
	Termination Notice	1	1	0	1
ESTABLISH SERVICE					
	Deposit Required	4	0	0	1
	Move-in	6	0	0	0
	Move-in Balance Owed	5	0	0	0
	Meter Set (New)	5	0	0	0
	Rule 9 (Tariff)	14	2	0	3
EMPLOYEE CONTACT					
	Billing Dept	4	0	0	2
	Credit Dept	0	0	0	0
	Call Center	22	0	0	1
	Call Center (External)	0	0	0	0
	Distribution	2	0	0	0
	Energy Conservation	0	0	0	0
	Meter Operations	1	0	0	1
	Security	4	0	0	0
FINAL BILLS					
	Bad Debt	2	0	0	2
	Identity Theft	1	0	0	2
METER ISSUE					
	Meter - Non Standard	4	0	0	1
	Meter - Standard	13	0	0	0
	Evidence of Tamper (EOT)	3	0	0	0
	Net Meter Installation	1	0	0	0
	Meter Not Registering	1	0	0	0
	Grandfathering	0	0	0	0
OUTAGE					
	Hazards	2	0	0	2
	NVE Equipment	9	1	0	1
	Power Outages	13	1	0	1
	Scheduled	1	0	0	0
PAYMENT					
	Bank Draft	4	0	0	0
	IVR	2	0	0	1
	Payment Arrangements	16	1	0	4
	Payment Posting	11	0	0	5
	Web/Online	5	0	0	0
	flexpay	7	0	0	0
PROGRAMS-Assistance					
	Elderly / Disabled	0	0	0	0
	Energy Assistance	2	0	0	3
	Green Cross (Life Support)	3	0	0	0
	Third Party Notification	0	0	0	0
PROGRAMS-Energy					
	Cool Share Issue	5	2	0	2
	Energy Audit	0	0	0	0
	Energy Conservation	1	0	0	1
	Mpower Issue	0	0	0	0
	Subtotals	477	25	0	94
	Total				596

CUSTOMER SPECIFIC NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO: 23-03036 REQUEST DATE: 04-19-2023
REQUEST NO: STAFF 01 KEYWORD: Employee Turnover
REQUESTER: Olesky RESPONDER: Silveyra, Angelica

REQUEST:

Reference: Turnover Prevention Policies & Plans

Question: Page 6 of the Report states that Service Levels decreased in 2022 due to increases in volumes across voice, chat, and email channels. Additionally, NV Energy experience significant agent turnover with a 98.8% turnover rate.

1. Please provide the total number of employees (agents) in that department and the total number of employees who left that department during 2022, as they were used to calculate the 98.8 percent turnover rate.
2. Please explain if the total number of employees listed above were local (living in Nevada) or if any of the agents live outside the state and work in a 'remote' call center where NV Energy customer service calls are routed to for answering.
3. Please provide the total agent headcount by month for calendar year 2022.
4. Of the total number of employees who left the that department in 2022, please state: the number that retired, the number that were terminated by the Company, the number that voluntarily left the company, and the number that left the Customer Service department to move to a different department within NV Energy.
5. If NV Energy performed any kind of exit interview for those employees who voluntarily left the Company in 2022, please list every reason why they left their job.
6. If NV Energy is aware of a root cause that created a 98.8 percent turnover rate, such pay rate, change in management, change in department or company policies, outsourcing jobs, etc, please explain in detail why NV Energy believes it had a 98.8 percent turnover rate in a single department in a single year.
7. Please provide the agent turnover rates for 2018, 2019, 2020, 2021.
8. Please provide the agent turnover rates for the first 3 months of 2023.
9. Please provide the turnover rate for NV Energy as a whole (all employees) for calendar year 2022.

If you have any questions relating to this data request, including the terminology used, please email Karen Olesky.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

Staff – 1

1)

Month Avg	Headcount	Separations	Turnover Rate
Jan-22	174	24	13.79%
Feb-22	154	14	9.09%
Mar-22	175	11	6.29%
Apr-22	178	12	6.74%
May-22	186	20	10.75%
Jun-22	193	20	10.36%
Jul-22	199	13	6.53%
Aug-22	91	14	7.33%
Sep-22	216	23	10.65%
Oct-22	223	13	5.83%
Nov-22	253	15	5.93%
Dec-22	271	15	5.54%
Total	194		98.83%

2) Month	NVE Employees	Outsourced Call Center
Jan-22	133	41
Feb-22	118	36
Mar-22	128	47
Apr-22	136	42
May-22	133	53
Jun-22	148	45
Jul-22	147	52
Aug-22	142	49
Sep-22	152	64
Oct-22	137	86
Nov-22	156	97
Dec-22	157	114

3) Month	Avg Headcount
Jan-22	174
Feb-22	154
Mar-22	175
Apr-22	178
May-22	186
Jun-22	193
Jul-22	199
Aug-22	191
Sep-22	216
Oct-22	223
Nov-22	253
Dec-22	271

4) Of the 194 total separations, there were 50 that were internal transfers to other departments within NV Energy or promotions within the Contact Center. Another 90 separations occurred at Active TeleSource, our outsource call center. The remaining 54 separations were departures from the company, 10 terminations, 39 resignations, 2 long-term disability and 3 retirements.

5) NV Energy Total Voluntary Terminations 2022

Reasons For Leaving	
Internship Completion	14
Other	47
Other Job Opportunity	64
Personal Reasons	28
Relocation	9
Retirement	121
Transfer to BHE Platform	7
Grand Total	290

6) A big part of the 2022 attrition occurred at Active TeleSource, our outsource call center. Active TeleSource agents are work from home agents, therefore, more training and leadership support is needed to ensure employees are successful. It also requires an employee who is very self-motivated, has excellent time management skills and is tech savvy. The top two reasons for voluntary terminations at Active TeleSource were personal reasons and medical issues.

7) We do not have attrition data for 2018 and 2019.

- 2020 – 42.95%
- 2021 – 46.77%

8) • Q1, 2023 – 21.85%

9) NV Energy turnover rate for 2022

- 13%

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO: 23-06007 REQUEST DATE: 08-17-2023
REQUEST NO: Staff 265 KEYWORD: MDR 96E/Operational
Performance Metrics
REQUESTER: Cuneo RESPONDER: Brown, Shannon

REQUEST:

Reference: MDR 96-E

Question: (See page 241 of 364) Please describe how NVE measures and tracks the metric "% of Calls answered within 30 seconds".

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

The percentage of calls answered within 30 seconds is a combination of two components, which are agent-answered calls and technology-answered calls. For calls answered by agents, it is the sum of calls answered within 30 seconds divided by the sum of calls offered. All agent-answered calls are timed from the moment they leave the interactive voice response ("IVR") and enter the queue to wait for an agent. For calls answered by technology, this includes all calls answered by the outage IVR, non-outage IVR, and Western Union IVR where the customer did not select to speak with an agent. All technology-answered calls are answered within 30 seconds.

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO: 23-06007 **REQUEST DATE:** 08-17-2023
REQUEST NO: Staff 266 **KEYWORD:** MDR 96E/Operational
Performance Metrics
REQUESTER: Cuneo **RESPONDER:** Brown, Shannon

REQUEST:

Reference: MDR-96E

Question: (Please see p. 241 of 364) Provide any and all analysis NVE has performed as to why the % of calls answered within 30 seconds has declined since 2020. Also, please provide an explanation of and programs for process improvements NVE plans to use to increase that percentage going forward.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

The key drivers behind the reduced percentage of calls answered within 30 seconds include the following:

- NV Energy resumed disconnects for non-payment in April 2021, which led to an increase in call volume commensurate with pre-COVID levels. NV Energy continues to see an increase of calls year over year.
- Attrition increased significantly in June 2021 and has remained high since then. Where NV Energy contact center previously averaged seven transitions per month, the department currently sees an average of 16-20 transitions per month. A high number of transitions are due to internal job opportunities within the Company. This increase is consistent with Customer Service positions across many industries in the post-COVID employment environment.
- The post-COVID economic impact to customers has led to longer conversations on billing and payment matters. This is further exacerbated by inflation and related economic factors experienced by our customers. Where the average handle time per call was previously 5 minutes 40 seconds in 2020, it increased to 7 minutes 16 seconds in 2022 and 7 minutes 40 seconds in 2023 (through July).

The Company has enacted the following adjustments to combat the reduction in Service Level:

- Since early 2022, the Company strategizes opportunities to lessen call volume through the following:
 - o Adding up front interactive voice response messaging during outages
 - o Identifying programs for process improvements to minimize direct agent calls.
 - o Identifying opportunities to communicate self-service options through advertisements, commercial campaigns, social media, and email communications.
- NV Energy has dramatically increased the pace of hiring and training for Customer Service positions over the past year and a half. This effort continues.
- NV Energy paused the customer voicemail option. This option was designed for rare circumstances of extreme call volumes. In the wake of record attrition, with increased call volume, and increased handle times, this feature became unsustainable. The number of employees it took to make callbacks decreased the number of available staff for inbound customer calls, thus lengthening the wait times for customers.
- NV Energy fine-tuned configurations within the Virtual Hold functionality throughout 2022 to optimize its efficiency while building up staff.
- NV Energy paused the use of Live Chat functionality in November 2022 to concentrate efforts on inbound calls as chat interactions are longer agent handle times. When it is feasible to resume Live Chat, there is an option for dynamic automation to offer this feature during times of higher agent availability to optimize staff availability for inbound customer calls.
- NV Energy has an active project pursuing enhanced chatbot capabilities for our website to assist with basic customer inquiries.
- Contact Center Leadership maintains a continuous focus on performance management to ensure Customer Service agents are adhering to their schedules, providing quality customer service, and using their time efficiently.

While this is an ongoing effort, the contact center is on an upwards trajectory in 2023 as compared to 2022. The 2022 Service Level was 62.5 percent, and the 2023 Service Level was at 79.3 percent year-to-date at the end of July. This represents an increase of 16.8 percentage points over 2022. As the company navigates Summer peak volume, there is an anticipated drop of 2-4 percentage points. However, the business remains committed to concentrated efforts to improve our service to customers through the rest of 2023 and into 2024.

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO: 23-06007 REQUEST DATE: 08-17-2023
REQUEST NO: Staff 267 KEYWORD: MDR 96E/Operational
Performance Metrics
REQUESTER: Cuneo RESPONDER: Brown, Shannon

REQUEST:

Reference: MDR-96E

Question: (Please see p. 242 of 364), Please explain in detail:

- A) The reason NVE's abandoned call percentage shot up to 30% in 2022;
- B) Any and all analysis performed on that metric; and
- C) NVE's plans to reduce that percentage going forward.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

A) In July 2021, Contact Center agents were required to return to the office versus work from home. There was significant, unprecedented increase of attrition upon returning Contact Center agents back to the office which resulted in NV Energy entering 2022 understaffed. There were 61 customer service agent separations from July 2021 through December 2021. There were 24 customer service agent separations in January 2022 and a total of 194 for the entirety of 2022 equating to an average of 16 separations per month. This total more than doubled the number of separations in 2020 (which was 95 customer service agent separations) and closely doubled the number of separations in 2021 (which has 99 customer service agent separations).

Elevated recruiting effort began followed by new hire training in effort to offset the unprecedented, increased attrition above the original forecast. The four-month customer service agent onboarding process, counting from recruitment to completion of training, resulted in a lag of available resources active in production and on the phones to answer customer inquiries. Once in production, new customer service agents tend to have higher average call handle times due to inexperience. Higher handle times increase staffing requirements and leads to higher

abandonment rates until the handle times decreases and/or appropriate staffing levels are met to meet the higher demand generated by the higher handle times.

B) The root cause of the increase in this metric was the unprecedented customer service agent attrition being higher than anticipated resource forecast and longer call handle times coupled with inexperienced new agents taking customer calls.

C) There were 287 customer service agents hired in 2022 and 137 customer service agents hired year to date 2023 to offset attrition. Increased hiring was necessary to backfill vacated positions and to address the higher handle times generated by the inexperienced workforce (nearly 75 percent of the current staff has a tenure of one year or less). As a result of planning, the abandonment rate for the first quarter of 2023 fell to 12.00 percent. It has been 4.45 percent since the start of the second quarter of 2023 and is at 7.32 percent year-to-date (as of August 23).

Additionally, NV Energy has implemented several training process improvements with new hire training to ensure that new employees become proficient faster. Contact Center leadership has a continued focus on performance management regarding decreasing customer service agent average call handle time.

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	23-06007	REQUEST DATE:	09-01-2023
REQUEST NO:	Staff 322	KEYWORD:	Staff 266/Op Performance Metrics
REQUESTER:	Cuneo	RESPONDER:	Brown, Shannon

REQUEST:

Reference: Response to Staff-266

Question: Staff requested in the original DR for NVE to provide any and all analyses performed. No analysis was attached other than the statements contained in the response. Please confirm that NVE performed no prior analysis regarding this issue.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

NV Energy has performed no analysis for this data request.

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	23-06007	REQUEST DATE:	09-01-2023
REQUEST NO:	Staff 323	KEYWORD:	Staff 266/Op Performance Metrics
REQUESTER:	Cuneo	RESPONDER:	Fowler, Woody (NV Energy)

REQUEST:

Reference: Response to Staff-266

Question: NVE states that it "has enacted the following adjustments to combat the reduction in Service Level. . . By identifying "programs for process improvements..." and "Opportunities to communicate..."

As requested previously in this DR, provide a copy of NVE's analysis which identifies these programs and opportunities.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

NV Energy's analysis involves categorizing customer calls made through self-service channels into specific types, such as inquiries, technical issues, or billing problems. By examining call volume, average handling times, and resolution rates for each type, NV Energy identified areas where call volume could be reduced by featuring self-service options to customers. Customers are being informed of these options through traditional outreach channels such as bill-insert messaging, social media posts, and promotional material on weekly energy snapshot email alerts.

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	23-06007	REQUEST DATE:	09-01-2023
REQUEST NO:	Staff 326	KEYWORD:	Staff 267/Return to Office
REQUESTER:	Cuneo	RESPONDER:	Dixon, Cynthia (NV Energy)

REQUEST:

Reference: Response to Staff-267B

Question: The original DR asked for any and all analysis regarding this issue. NVE did not provide any analysis other than the statement regarding "root cause" in this response. Please confirm that there is no analysis available as it was not provided.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

There is no analysis available other than what was provided in the response to Staff 267.

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO: 23-06007 REQUEST DATE: 09-01-2023
REQUEST NO: Staff 319 KEYWORD: Active TeleSource/MDR 38
REQUESTER: Loar RESPONDER: Pettinari, Damon (NV Energy)

REQUEST:

Reference: Active TeleSource - MDR 38E

Question: MDR 38E shows approximately \$8.6M in the "Payment Amount" column pertaining to the vendor Active TeleSource. Please state the dollar value requested for recovery from the vendor Active TeleSource in this the instant Docket (Nevada jurisdictional) and if that amount differs from the \$8.6M calculated in MDR 38E please provide a narrative explaining why.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: One (Zipped)

RESPONSE:

The Nevada Jurisdictional amount from the Vendor Active Telesource requested for recovery in this instant Docket is approximately \$2.2M. Please see Staff 319 Attach 01 for details. The amount differs from the \$8.6M calculated in MDR 38E because the data submitted in MDR38E included amounts paid during the latter months of 2021 and early months of 2023 and included amounts paid by Sierra Pacific Power Company to ensure that the vendor listing is as complete as possible. Additionally, the report used to generate the data submitted in MDR 38E lists the total payment amount on each voucher line meaning that a single payment may be shown on multiple lines. For example, Payment ID 1000408152 refers to one payment of \$138,272.36 for two vouchers (01028410 for \$69,384.66 and 01028369 for \$68,887.70 which totals \$138,272.36). The single payment for the two vouchers is listed twice in the "Payment Amount" column because it is listed on each line item for each voucher but only one payment of \$138,272.36 was actually made.

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO: 23-06007 **REQUEST DATE:** 09-01-2023
REQUEST NO: Staff 320 **KEYWORD:** Staff 265/IVR
REQUESTER: Cuneo **RESPONDER:** Brown, Shannon

REQUEST:

Reference: Response to Staff 265

Question: Does NVE track the amount of time that a customer spends in its "IVR" system?
If so, please provide the data for that for calendar year 2022.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

NV Energy does not track the amount of time a customer spends in its Interactive Voice Response (IVR) system.

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO: 23-06007 REQUEST DATE: 08-24-2023
REQUEST NO: Staff 291 KEYWORD: FERC Form 1
REQUESTER: Cuneo RESPONDER: Morley, Daniel

REQUEST:

Reference: FERC Form 1, Q4

Question: Please explain:

- A. Why did "Miscellaneous Distribution Expenses" increase in 2022?
- B. Why did "Maintenance of Meters" increase in 2022?
- C. Why is there a negative number for "Supervision, Customer Service and Information Expenses" in 2022?
- D. Why is there an increase in "Outside Services Employed" in 2021 and 2022?

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

A. Miscellaneous Distribution Expenses increased in 2022 compared to 2021 primarily due to higher telecommunication costs, higher training and small tool costs from an increase in linemen, higher new business project cancellations, higher inventory obsolescence costs and certain vegetation management and labor costs removed from the NDPP regulatory asset. In preparing this response, it has been determined that the costs removed from the NDPP regulatory asset of \$517,791 recorded to FERC account 588 were inadvertently included in the revenue requirement requested in this docket and should be removed. These costs are jurisdictionally allocated 100% to Nevada.

B. Maintenance of Meters increased in 2022 compared to 2021 primarily due to the testing of all removed meters as opposed to only a subset of removed meters as was done in previous years offset by a decrease of "in service check" testing costs which are now recorded to capital as a part of the installation process.

C. Supervision Customer Service and Informational Expenses is negative in 2022 due to a one-time accounting credit related to NEM Rule 15 Interconnection Fees recorded in 2022. This one-time credit was removed in Schedule H-CERT-24.

D. Outside Services Employed increased in 2021 as compared to 2020 primarily due to higher charges from affiliates billed through the Intercompany Administrative Services Agreement for Information Technology charges. Outside Services Employed increased in 2022 as compared to 2021 primarily due to higher charges from affiliates billed through the Intercompany Administrative Services Agreement for Information Technology and Business Development and External Relations charges.

AFFIRMATION

Pursuant to the requirements of NRS 53.045 and NAC 703.710, Anne-Marie Cuneo, states that she is the person identified in the foregoing prepared testimony and/or exhibits; that such testimony and/or exhibits were prepared by or under the direction of said person; that the answers and/or information appearing therein are true to the best of her knowledge and belief; and that if asked the questions appearing therein, her answers thereto would, under oath, be the same.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 9/25/23



[WITNESS]