



## State Utility Regulatory Commissions' Billing Systems Standards and Practices: Preliminary Review

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November 2015



## Presentation outline

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- Brief explanation of methods used and approach to the project
- Preliminary findings, all subject to change based on continuing research:
  - from literature review
  - from content analysis of state public utility billing rules for electric, gas, water & wastewater utilities
  - from state utility commission complaints data
- Next steps for this project

- Review of literature, dockets, case law, utility web-pages
- Initial, brief questionnaire sent to state commissions:
  - 30 responses, remainder from commission web-sites
  - Identifying state contact persons, billing rules citations and important billing-related dockets, and complaints data
- Billing rules content review and summary
  - Identifying common categories covered, plus unusual or unique aspects from specific states
  - In-state contacts check and verify research
- Review of state utility commission complaints data
  - Comparisons by various utility type
  - Report of billing-related complaints, % by topic

- Goals and objectives for billing and related communications rules (for commissions, utilities, consumers of different stripes, and society as a whole)
- Historical trends in literature:
  - piecemeal progression over time
  - energy efficiency and content-labeling thrust in 80s-90s
  - competitive supplier billing since mid-90s
  - recent trends towards integrating communications channels and content
  - increasing customer engagement:
    - × grid modernization
    - × emergency communications
    - × social media
  - NRRI Report No. 12-07, *Difficult Communications*

## Billing rules categories

State	Minimum contents	Service deposits	Estimated bills	Master metering	Historical usage	Dispute resolution	Third-party agents	Levelized billing	Payment methods	Payment assistance	Partial payments	Special payment plans	Denial, disconnection	Weather-related shut-off	Electronic billing	Customer data privacy
Number of States Including This Topic	45	46	43	31	21	42	26	29	10	27	16	34	42	31	14	15
Indiana	Y	Y	Y	Y		Y		Y				Y	Y			

- Several other categories are not included, because they are nearly universal (for example: meter errors, accuracy and testing; unauthorized use; late payments and returned checks; and disconnections due to health and safety concerns or in a state of emergency)
- Industry types covered by rules varies by state.

## Historical usage

- Rules from 21 total states require utilities to provide customers with historical usage data, usually for 1-year back
  - This could be a regular practice elsewhere, without being mentioned in formal rules
- Only one state (Idaho), requires the information to be provided only on the bill, one state (Arizona) requires it in other communications but not on the bill, and the other 19 states require it both on bills and in other communications
- Three states require utilities to provide it only upon customer request (New Hampshire, South Carolina, and Tennessee), and one state (Wisconsin) explicitly requires reporting historical weather data in addition to usage data

## Payment assistance

- Payment assistance rules generally require utilities to provide information to customers about non-utility sources of financial assistance, and also often about available energy efficiency or conservation programs
- Requirements are in rules from 27 states
- Information is required to be both on bills and in other communications in 22 states
- Information is required to be on bills only in Alaska, Connecticut, and Kansas
- Information is required not on bills but in other communications in one state (Arkansas)

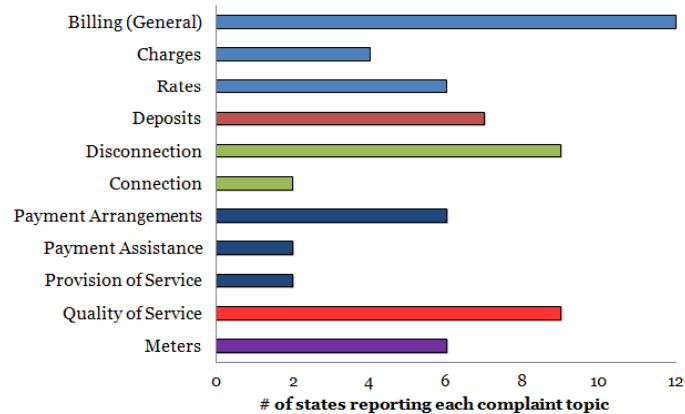
## Weather-related shut-off

- These rules typically prohibit utility shut-offs during certain months, and include provisions for special payment plans and payment assistance information
- Included in rules from 31 states, most states covering winter heating months, but a few states cover only summer air conditioning months. Only Georgia's rule covers both heating and air conditioning periods

## Preliminary complaints data

- Complaint data based on responses from 17 states
  - 17 states provided data on complaints by industry type
  - 12 states provided data on complaints by topics/issues
  - 8 additional states said they can do queries for us
- Timelines are not uniform
  - Length of time information collected varies
  - Year of data reporting varies
  - 2012 is earliest data used
- Complaint data varies widely, so only percentages are reported

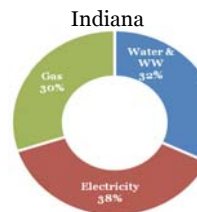
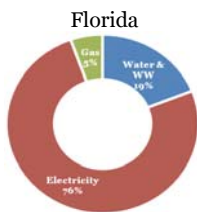
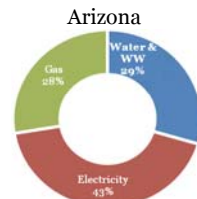
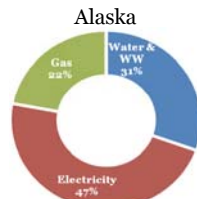
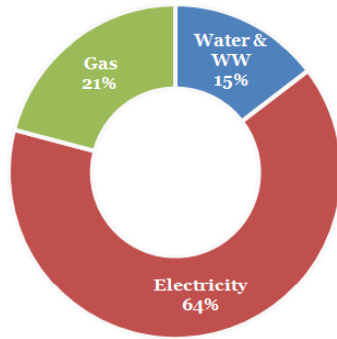
## Complaint classifications



- There is little consistency in how states code complaints by topic, which makes comparisons difficult

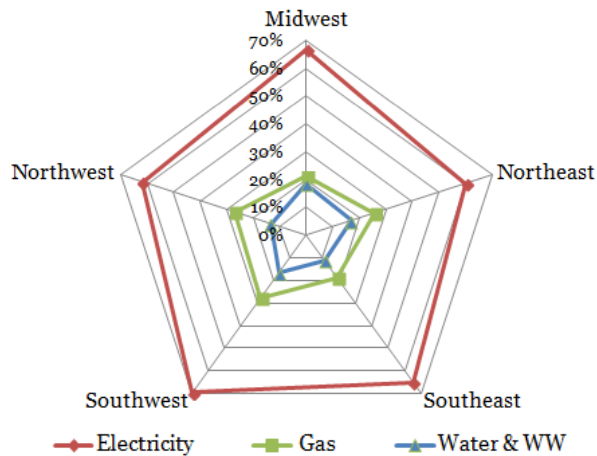
# Complaints by industry type

Average of 17 states



- While we have information on billing rules from all 50 states, only 17 states provided complaints data.

# Complaints by region



- State by state, complaint data can change markedly in response to known events
- Some state commissions do not track complaint data for all industry types

- **Next steps for literature review**
  - Review of sample utility bills and explanations
- **Next steps for billing rules data:**
  - finalize missing data
  - confer with each state to make sure our understanding is correct
  - Finalize overall summary and identify any particularly interesting ideas from specific states
- **Next steps for complaints data**
  - Follow up with states that may provide data details
- **Preliminary report completed by mid-January**
- **Report to be published by second week of February**