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STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

At a Session of the Public Service
Commission held in the City of
Albany on April 27, 1988

COMMISSIONERS PRESENT:

Peter Bradford, Chairman
Harold A. Jerry, Jr.
Gail Garfield Schwartz
Eli M. Noam
Edward M. Kresky
Henry G. Williams

STATEMENT OF POLICY
ENDORISING MODEL UTILITY SENIOR PROGRAM

(Issued June 1, 1988)

BY THE COMMISSION:

Introduction

We are issuing this Statement of Policy in support of the Model Utility Senior Program, a copy of which is attached to this Policy Statement. This Program is designed to guide New York State utilities in the provision of services to the elderly. The Program results from the combined efforts of staff of the Consumer Services Division and the Commission's three regional Senior Citizen Advisory Councils. The Councils, formed in 1985, consist of approximately 20 members each, and include representatives and leaders of senior citizen organizations and advocates for the elderly. The Program is comprised of 20 component programs which together establish continuing two-way channels of communication between utilities and their senior

customers, provide certain direct services to seniors, and encourage utilities to provide sensitivity training to employees who serve the elderly. The Program has been submitted to 19 major utilities for review and comment.

Background

In 1984 and 1985, staff established a Senior Citizen Task Force Program to address the needs of senior utility customers regarding utility services. In particular, given the special vulnerability of seniors to the loss of utility services, staff felt that it was critical that seniors be informed concerning the special protections and assistance programs available to them, and the ways in which they can reduce utility costs. Moreover, it was felt that utilities should actively seek to identify and address the special needs of their senior consumers.

In 1986, an initial survey was made of existing programs offered by utilities for senior customers. It showed that various utilities had developed a number of senior initiatives such as newsletters for seniors, large print publications, and presentations at senior sites but that the availability of such services varied widely from company to company.^{1/}

Based on this information, utility senior programs were discussed at meetings of our regional Senior Advisory Councils in

^{1/} Collectively, the consumer affairs departments of several of the utilities provided a group of programs which served as a starting point from which to develop the comprehensive program set forth herein. Since that initial survey, additional innovative senior programs have been developed which are reflected in the Model Utility Senior Program.

Albany, New York City and Western New York.^{1/} The Councils supported the development of a utility senior program designed to bring greater information to seniors and to address difficulties with specific utility services. The Councils reviewed the existing programs, commented on their value and suggested new programs. The Councils sought to develop programs that would not entail large, unnecessary expenditures.

The Councils agreed that prerequisites to any utility effort on behalf of senior consumers are: genuine company commitment, demonstrated by substantive action; access to high level utility officials responsible for corporate decision making; and concerted efforts to inform senior consumers of the services and protections available to them.

Based on the Councils' discussions and drawing from the utilities' existing programs, staff developed a proposed Model Utility Senior Program, which the combined Councils unanimously voted to approve as incorporating the basic programs necessary to inform seniors of their rights as utility consumers.^{2/}

1/ Senior Council meetings in Western New York were conducted by Honor Marie Kennedy, Supervisor of Western New York Operations; Council meetings in New York City were conducted by Vilma Ellemberg, Assistant to the Director, Consumer Services Division, and Lucille Merkowitz, Coordinator of Senior Programs. The Albany sessions were chaired by Lisa Rosenblum, Division Director, who also addressed sessions of the other Councils.

2/ Appendix A contains the names of Council members at the combined session. Appendix B incorporates the final revisions made to the program by the seniors.

The proposed Model Program was then submitted to 19 utilities: 10 major gas and electric companies, eight of the largest telephone companies and the State's largest water utility.^{1/} The companies were invited to comment and to submit an updated inventory of their own senior programs. While some companies took issue with certain elements of the program, the overall response was generally positive.

Summary of Model Senior Program

The proposed Model Utility Senior Program represents a program designed by senior leaders for seniors, based on their special knowledge of the needs of the elderly gained through leadership roles in their communities. The Model sets forth a framework for the comprehensive provision of information, services and assistance for senior citizen utility consumers.

The proposed Program envisions implementation of a multi-service senior program built around a core of 20 components or vehicles grouped under four headings: (1) information from the companies to seniors, such as speaking presentations and large print

^{1/} Brooklyn Union Gas Co. (Brooklyn Union), Central Hudson Gas & Electric Corp., (Central Hudson), Columbia Gas of New York, Inc. (Columbia Gas), Consolidated Edison Co. (Con Edison), Long Island Lighting Co. (LILCO); National Fuel Gas Distribution Corp. (NFG), New York State Electric and Gas Corp. (NYSEG), Niagara Mohawk Power Corp. (Niagara Mohawk), Orange & Rockland Utilities, Inc. (O&R), Rochester Gas & Electric Corp (RG&E), ALLTEL New York (ALLTEL), Ausable Valley Telephone, Company (Ausable Valley Tel), Continental Telephone Co. of New York (CONTEL), Highland Telephone Company (Highland Tel), New York Telephone Company (New York Tel), Rochester Telephone Corporation (Rochester Tel), Sylvan Lake Telephone Company (Sylvan Lake Tel), Taconic Telephone Corporation (Taconic Tel), and Jamaica Water Supply Company (Jamaica Water).

publications; (2) information from seniors to company representatives, such as senior ombudspersons and consumer advisory councils; (3) various direct services to seniors, such as extended payment plans and large print bills; and (4) special training to make company employees more responsive to the needs of seniors.

The Program also sets forth general guidelines regarding the implementation of all of the suggested activities. Full implementation by utilities would provide all senior utility consumers in the State with a program of uniform broad coverage and built-in quality controls. Above all, it would be a program for seniors designed in large part by seniors as well as by professionals -- such as directors of senior citizen centers, and consumer affairs specialists within the utility -- who provide services to seniors. It is staff's belief that this would be the first such program in the nation.

Company Responses

The Model Program received a generally favorable response from the utilities surveyed, although relatively minor reservations were expressed by some companies. Most utilities expressed a commitment to programs to help seniors, and many said they already are providing most of the 20 activities identified in the Model. Some utilities took issue with certain features of the Model. Two companies criticized as excessively frequent a proposed requirement for quarterly reports, and one did not agree with a proposed Senior ID application checkoff box on utility bills. Two recommended that the

age definition for seniors be 60 years rather than the proposed 62.

Many utilities underscored the need for flexibility. We do not think this is a problem. In general, the Program is presented as a series of desirable activities and services, with recommended ways of improvement. The differing needs and concerns of seniors in various parts of the State was one of the primary topics considered by the Senior Councils throughout their deliberations, and the need for flexibility was recognized, including the request that companies be allowed to provide senior programs in addition to those in the Program.

One utility complained that the Program would require utilities to coerce seniors into participating. This complaint is not supported by the language of the Model Program. The Program encourages companies to identify their senior customers. This should already be a priority, given the importance of the special legal protections available to seniors. In addition, to ensure adequate protection, utilities are also encouraged to educate seniors about all of their rights. We see no coercive element in either of these utility activities.

One utility objected to the fact that the Model proposes that the companies establish performance goals and track their performance. In our view, the use of goals is a standard management procedure and should be included as part of the Program.

Four of nine revisions recommended by the Senior Councils in their final review were challenged by some utilities. These included: a Senior ID checkoff on the utility bill; inclusion of rate-case

information in bill enclosures; a provision that utility outreach also be done through the senior leaders in the community; and requiring utilities to file quarterly reports on their Model Senior Program activities. In our view, the use of a Senior ID checkoff and the provision of information concerning upcoming rate cases -- such as the time, date and location of Commission public statement hearings -- are reasonable and relatively simple methods of creating direct channels of communication well suited to the achievement of important objectives. As for outreach liaison with senior leaders, such contacts should not in any way interfere with the utilities' existing contacts with organizations serving seniors. It merely provides for an additional notification to the senior leaders. This appears to be a reasonable provision. The utilities' objections to quarterly reporting are well taken. Therefore, the proposed Program has been modified to call for annual reports rather than quarterly reports.

Conclusion

Based on the foregoing considerations, we issue this Statement of Policy in support of the Model Utility Senior Program. We shall serve copies of the Program on all New York State utilities for use as a framework upon which the utilities can develop or expand their own programs. Further, we request that companies file plans for implementing the Model Program within 60 days of the issue date of this Statement of Policy.

By the Commission,

(SIGNED)

John J. Kelliher
Secretary

Appendix A

SENIOR COUNCIL MEMBERS IN ATTENDANCE

At the Combined Statewide Meeting
Albany, New York
Wednesday, October 28, 1987

Ruth Beebie, Plattsburgh -- Member, Clinton County Office for the Aging Advisory Committee.

Ruth Chauvin Browne, Albany -- Active in the Colonie Senior Service Centers, Inc.

Walter Davis, Corning -- President, Corning Senior Citizens; Vice President, StateWide Senior Action Council.

Marta Denis, Manhattan -- Information Specialist, Institute of Puerto Rican Hispanic Elderly.

Margaret Dittrich, Latham -- Past President, Colonie Chapter 2873, AARP.

Beryl Henry, Yates -- NYS Retired Teachers Association.

Theodore Henry, Yates -- NYS Retired Teachers Association.

Anna Mae Jones, Tonawanda -- Legislative Chairperson, WNY AARP.

S. Elizabeth Jones, Ballston Spa -- Active in the Saratoga County AARP Chapter.

Rose Kryzak, Flushing -- President, StateWide Senior Action Council.

Kathy Laramie, Plattsburgh -- Director, Clinton County Office for the Aging.

Alice Logan, Sinclairville -- President, Chautauqua County Senior Citizen Council.

Alfred Lui, Manhattan -- Director, Chinatown Senior Center.

William Michalski, Amsterdam -- Past President of the StateWide Senior Action Council, and President of the Montgomery County Senior Action Council.

Blanche Nechanicky, Albany -- Vice President, Capital District Retirees Chapter of CSEA.

Henry Osinski, Buffalo -- Chairman, Niagara Mohawk statewide Consumer Council.

Jack Ossont, Penn Yan -- Manager, Penn Yan Senior Complex.

Evan Pritchard, Albany -- Legislative Chairman of the Albany County Council of Senior Citizen Centers and Clubs.

Helen Quirini, Schenectady -- President, Local 301 Schenectady Retirees; Chairperson, Schenectady County Council of Senior Citizens.

Joseph F. Reimondo, Buffalo -- Assistant State Director, Western New York AARP.

Howard Ridall, Wyoming -- President, Wyoming Senior Citizens.

Dr. John Sampson, Albany -- Former leader of the NAACP's Albany Branch and Northeastern New York Regional Conference.

Lillian Singleton, Albany -- Member of AARP Chapter 78.

Florence Spillenger, Schaghticoke -- Co-founder, Congress of Handicapped Employees in State Service.

Henry Spink, Schenectady -- State Coordinator of AARP's Citizen Representation Project, which seeks to place seniors in policy-making positions.

William Taylor, Manhattan -- Executive Committee, New York State Council of Senior Citizens.

Steven Telzak, The Bronx -- Bronx Legal Services.

Leon Von Holden, Astoria -- President, Queens Council of Senior Citizens.

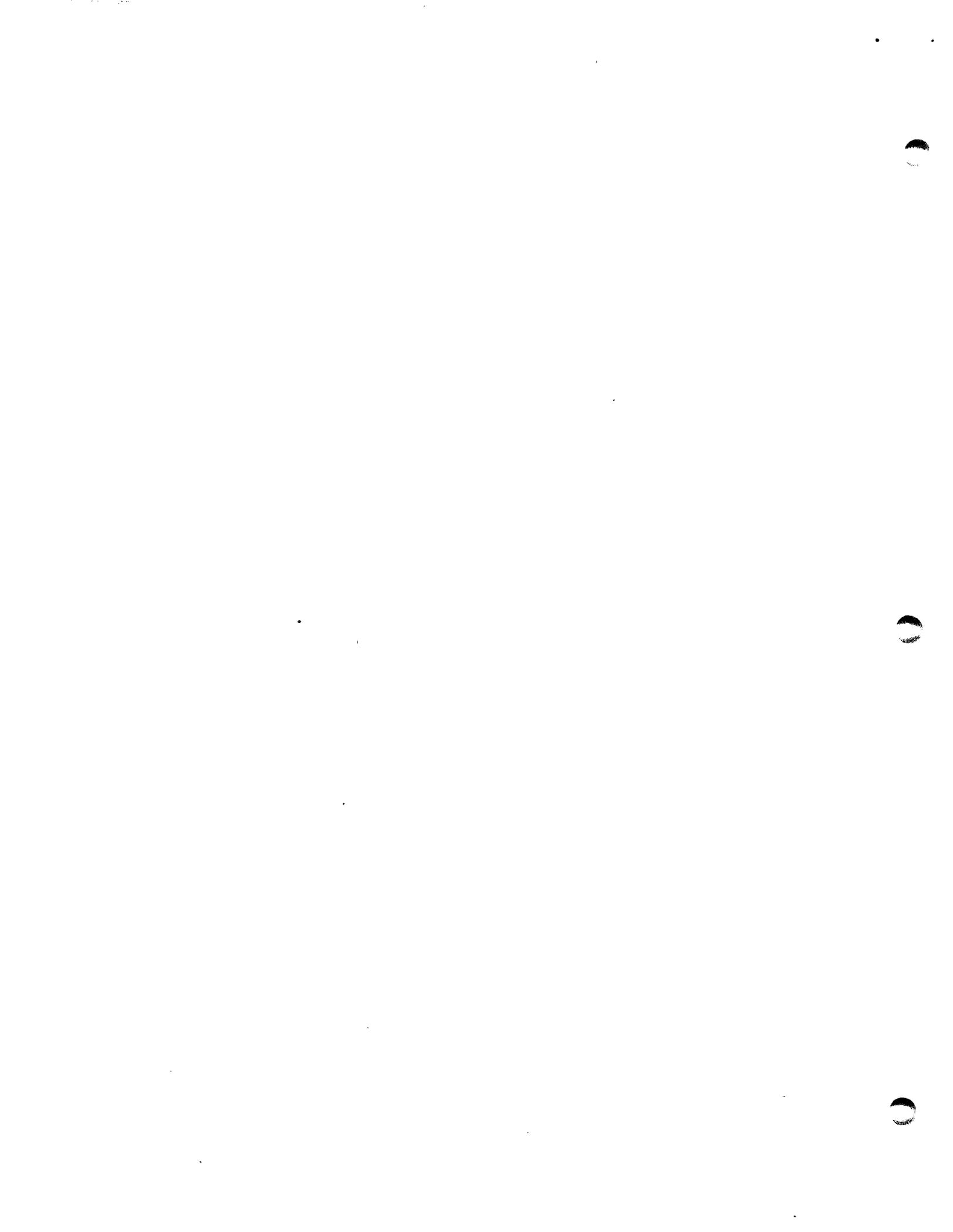
Michael Widzowski, Cohoes -- Past President of the Albany County Council of Senior Citizen Centers and Clubs.

Benjamin Wollner, Schenectady -- Past President, Mohawk Hudson Senior Citizens Leadership Council.

Appendix B

SENIOR COUNCIL MODIFICATIONS TO SENIOR MODEL PROGRAM

1. Require utilities to provide clear, plain language, multilingual publications and presentations;
2. Include a uniform age level definition in terms of the Model Program; (the age would be 62)
3. Include a check-off on the bill as to whether a customer is eligible for the senior identification program;
4. Include rate case information in the part of the program which provides information to the public;
5. Clarify the ombudsman definition and program; (the ombudsman would be a company employee)
6. Retain the recommendation that there be Senior Consumer Advisory Councils;
7. Require utilities to provide senior sensitivity training for employees;
8. Follow the suggestions in enforcing and monitoring the program including requiring utilities to file quarterly reports; and
9. Provide that utility outreach also be done through the senior leaders in the community.

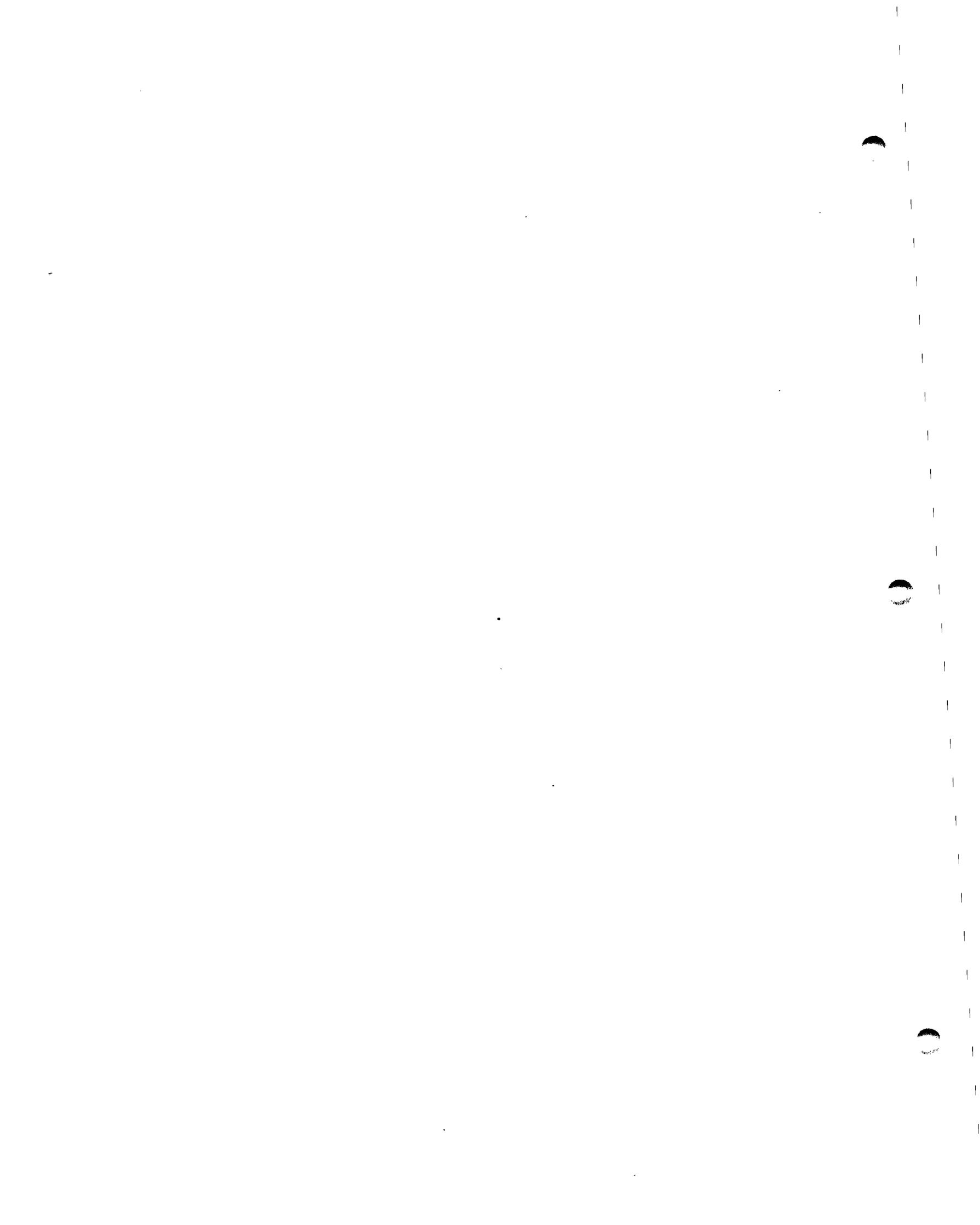


STATE OF NEW YORK

PUBLIC SERVICE COMMISSION

Consumer Services Division's
Model Utility Senior Program

MODEL UTILITY SENIOR PROGRAM



MODEL UTILITY SENIOR PROGRAM

Summary

I. Provide information to senior consumers

- Speaking presentations
- Large-print publications
- Media publicity
- Senior identification efforts

II. Seek input from senior consumers

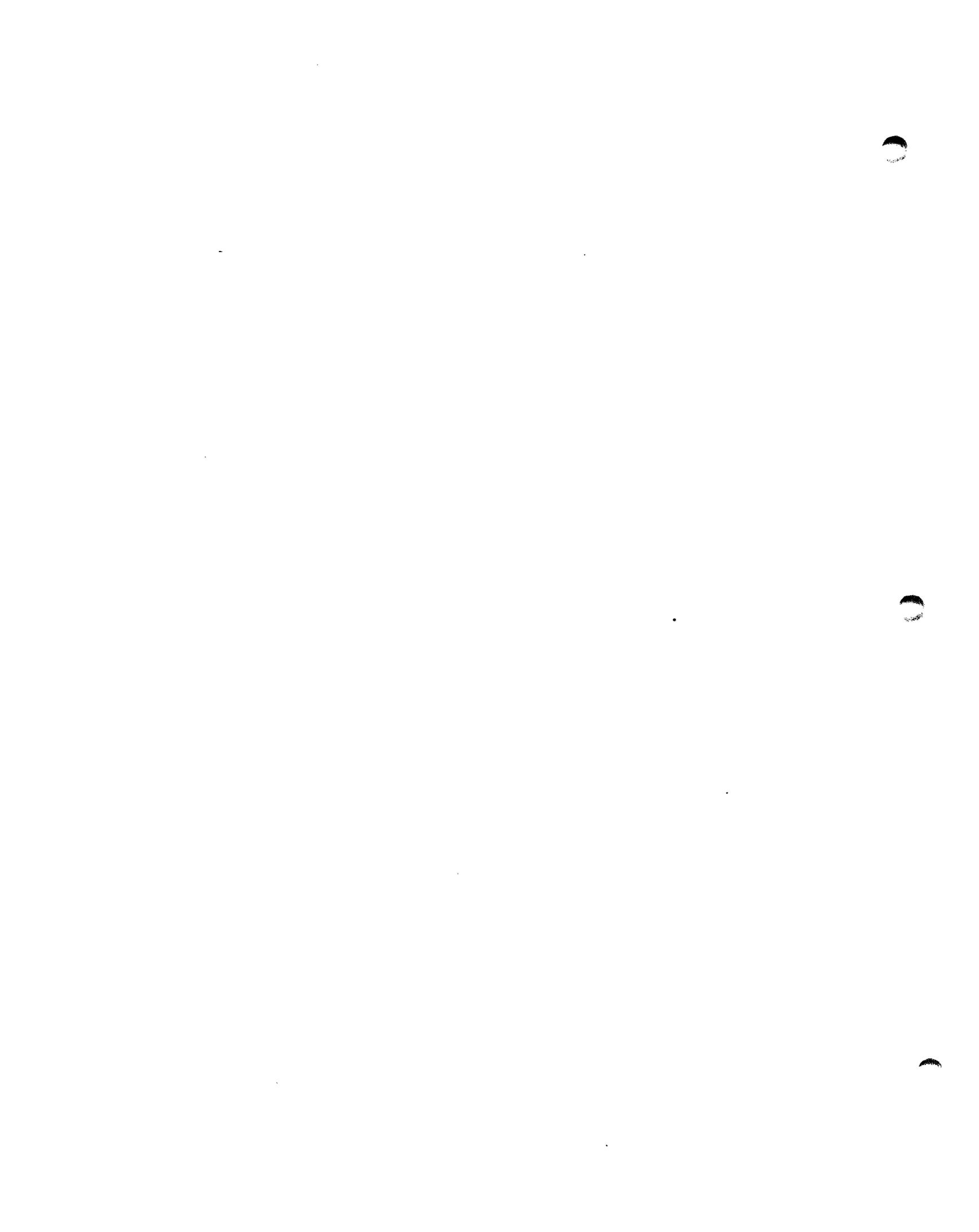
- Ongoing presence at senior community forums
- Senior ombudspersons
- Senior roundtables
- Consumer advisory councils

III. Provide direct service and assistance to senior consumers

- Quarterly billing
- Third-party notification
- Expedited complaint-handling
- Extended payment plans
- Extra security plans
- Programs for the hearing- and sight-impaired
- Large print bills
- Senior energy conservation incentives
- Multi-purpose senior programs
- Weatherization programs
- Senior volunteer programs

IV. Improve company responsiveness to senior consumers

- Senior sensitivity training



Introduction

The Model Utility Senior Program represents the ideas and recommendations of service providers and the Commission's three regional Senior Advisory Councils. Each of the councils -- made up of leaders from a wide cross section of organizations for the elderly -- met and held lengthy discussions on the merits of various utility activities. Their discussions resulted in a consensus on a group of utility activities which would provide needed services to the senior customers, and also provided significant insights into how these activities should be implemented if they are to be truly valuable to the senior community.

Moreover, the councils' discussions of individual activities yielded a commonly held belief that they feel is fundamental to the success of any utility senior program: such a program can be effective only to the extent that it is part of a comprehensive, results-oriented program which mirrors a company-wide commitment to take substantive action to respond to the needs of elderly consumers.

Staff has organized the recommended activities under a comprehensive program which has four components; these components reflect the primary objectives of a well-rounded utility senior program:

- o Provide information to senior consumers;
- o Seek input from senior consumers;
- o Provide direct service and assistance to senior consumers;
- and
- o Improve company responsiveness to senior consumers.

Under each category is listed the objective to be reached and a generic description of the recommended activities to achieve it. Also included are any guidelines for implementation suggested by council members. As emphasized by the senior advisors, these activities must be coordinated under an overall program which sets specific goals against which company performance can be measured. For example, under a campaign to identify senior customers for special protections, a company should provide an estimate of its senior customers, set a goal to be reached, frame a plan to reach the goal, and establish a system to regularly measure progress and evaluate the effectiveness of the plan.

This model program presents a minimum range of activities and should not be considered all-encompassing. Each utility company is encouraged to develop new programs to meet the specific needs of its elderly customers.

I. Provide information to senior consumers

Objective: To reach out to senior consumers to inform them of their rights and protections, the services available to them, and current rate case information. Activities to accomplish this objective include:

Speaking presentations -- company representatives address senior consumer groups to provide information, answer questions, and solicit concerns.

- o Companies should aggressively seek out senior audiences as part of a coordinated program to establish a network of contact groups to disseminate information on a regular basis.
 - o Presentations should offer to senior citizen groups and intermediaries timely, utility-related information, such as consumer protections and rights, special programs for the elderly, and money-saving options.
 - o To encourage attendance, presentations should be publicized well in advance through the organization(s) to be addressed.
 - o Speakers should give the audience the opportunity to ask questions and should be well versed to provide authoritative answers.
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Large-print publications -- newsletters for senior consumers, in large print, distributed regularly to senior customers, as well as large-print brochures.

- o Senior publications should be in 12 point, or larger, type, preferably with black ink on white paper, and should include timely, useful information relating to senior utility customers, as well as illustrations, graphics and "light" material to encourage people to read them.

Media publicity -- information of interest to senior utility consumers is communicated through low-cost media efforts such as consumer columns in newspapers, articles in special interest publications for seniors, and public service announcements and talk shows on radio and cable television.

- o To stimulate media coverage, utilities should make media representatives aware of the size of the senior utility population in their areas, as a measure of the importance of matters affecting these seniors.

Senior identification efforts -- customers are encouraged to notify the company if they are 62 or older (or blind or disabled) so the company will know they are eligible for special protections against service termination under the law and Commission regulations.

- o Company efforts to identify seniors should be a priority given the importance of the information. To ensure adequate consumer protection, these efforts should be

combined with initiatives to educate seniors about all all of their rights and responsibilities under the Home Energy Fair Practices Act (HEFPA) and the parallel set of rights and responsibilities contained in the PSC's Rules for Residential Telephone Customers. To further facilitate Senior ID enrollment, companies are encouraged to provide at least once a year and more frequently if possible, on the bill or a bill enclosure, a simple check-off box application form which can be returned with the customer's payment. Such a mailing should be made about six months after the annual notification of rights, a required publication which also includes a Senior ID application form.

II. Seek input from senior consumers

Objective: To establish a dialogue with senior consumers to identify their concerns and develop responsive policies. The utility's Senior Ombudsperson (details below) should direct this plan and its implementation. Activities to accomplish this objective include:

Ongoing presence at senior community forums -- to learn of senior concerns, company representatives routinely attend meetings concerning seniors.

- o Utilities should demonstrate their interest in elderly issues by advising senior citizen organizations that they welcome invitations to attend -- and participate in -- any of the groups' meetings at which utility matters will be discussed.

Senior ombudsperson -- a consumer advocate, employed by the utility and with corporate responsibility for coordinating company efforts to work with elderly customers, help resolve problems, identify special needs, and develop responsive policies.

- o The ombudsperson should visit senior audiences in his or her service territory two to four times a year to present updates on cold weather rules, topical issues, complaint-resolution, and new literature and programs.
- o To assist the senior ombudsperson, a specific utility customer representative should be trained and appointed in each company business office to develop and maintain a network with key intermediaries and the community.
- o Special efforts should be made to reach the homebound, including direct mail and training sessions with such outreach groups as Visiting Nurses, Meals on Wheels, and Adult Protection Services.

Senior roundtables -- special meetings, sometimes held annually for an entire day, to enable seniors to meet in their own community with company representatives and discuss company programs

and services.

- o Roundtables should be presented at least once a year at major population centers, and in facilities accessible to seniors.
- o A high ranking utility official should attend and be available to answer questions from seniors.
- o Groups from which the participants are invited should be offered the option of opening the session to persons of all ages.
- o When roundtables are conducted, they should be publicized well in advance through the organization(s) to be addressed.

Consumer advisory councils -- a group of consumers, including seniors, which provides two-way communication between the company and its customers on a continuing basis.

- o Consumer advisory councils should include, but not necessarily be limited to, senior citizens, representatives of senior citizen organizations, and representatives of intermediary groups which serve senior citizens.
 - o Utilities should, in writing, establish qualifications for membership, specify the duration of terms of membership, and the method by which meeting times, dates and places are to be set. These should be predictable so members can plan to attend.
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- o Company executives should attend the advisory council meetings to provide the opportunity for council members to receive authoritative answers to their questions.
- o If the company employs an ombudsperson, or consumer advocate with similar duties, that individual should attend the utility's consumer council sessions.
- o Summary reports on the meetings should be publicized.

III. Provide direct service and assistance in response to senior concerns

Objective: To develop quality programs which respond to the individual needs and generic problems in the senior community.

Activities -- both voluntary and required -- to accomplish this objective include:

Quarterly billing -- a special billing plan, required by law, giving customers 62 or older the option of paying gas and/or electric bills quarterly if these bills do not exceed an annual average of \$150.

Third-party notification -- the option (mandated by HEFPA and the Commission's telephone protections) of designating a third party to receive notices about suspensions, terminations and credit actions on behalf of a senior consumer, provided the third party agrees in writing to accept such notices.

Expedited complaint-handling -- special complaint resolution process which provides priority service to elderly customers.

- o Company complaint procedures should be clear and simple to make it easy for customers to gain access to the complaint-handling system.
- o Companies should consider establishing toll-free hotlines to help elderly customers resolve complaints or get information.
- o Companies should analyze the complaints they receive from customers to identify problems so that corrective actions can be taken.

Extended payment plans -- plans that allow older consumers to extend the due date of their utility bill if, due to an emergency such as an extended hospital stay, they cannot pay their bill on time. These plans ensure that consumers do not lose utility service and are not liable for late payment charges associated with missed payments when such emergencies occur.

Extra security plans -- special billing plans for customers over a certain age (60 or 62, depending on the company) which ensure continuous service during the winter months and help identify and code senior consumer accounts. Such plans are primarily designed to avoid service shutoffs.

Programs for the hearing- and sight-impaired -- special programs, services and equipment are made available to assist hearing and sight-impaired customers.

- o To more effectively reach and help handicapped customers, in particular those who are elderly, utilities should seek comments and recommendations from advocacy groups in an effort to find out which services are most needed, and which ways of communicating with the groups to be served are the most effective.
- o Utilities should share information with each other on successful programs for the handicapped.

Large-print bills -- available on request for visually impaired customers.

Senior energy conservation incentives -- to help low-income seniors conserve energy, the utility distributes free energy-saving devices such as water-flow restrictors and insulating gaskets, which help keep cold air from entering through electric outlet boxes in the walls.

Multi-purpose senior programs -- an umbrella program in which customers aged 62 or 60 (depending on the company) years of age or older are encouraged to enroll in order to participate in whatever senior consumer programs and services the company provides.

Weatherization programs -- low-income senior consumers are hired by the utility to help weatherize the homes of senior citizens.

Senior volunteer programs -- trained retirees advise senior customers with financial difficulty and speak to senior groups about utility company services.

- o Companies should make sure that senior volunteers are provided with necessary information and training to keep them up to date on company services.

IV. Improve company responsiveness to senior consumers

Objective: To increase employee awareness of the special needs and problems of elderly utility consumers, via:

Senior sensitivity training -- utility employees -- especially those who are in contact with customers -- are trained to recognize and respond more effectively to the needs of senior consumers.

- o Training should be provided to the widest range of company employees.

- o The program should include the development of a senior resource directory and provide a liaison with senior service providers.

General Provisions

In carrying out the foregoing Program, each company should:

1. Aggressively pursue the objectives set forth in the model;
2. Establish specific initiatives which contribute to achieving these objectives;
3. Set specific goals by which to measure performance; Establish a method of regularly evaluating the effectiveness of the overall program, as well as its individual components;.
5. Submit by March 1 annual calendar year reports to the Division on the progress of its program; and
6. Publicize and promote these initiatives -- in plain English or other languages where appropriate -- through brochures, bill inserts, annual notifications of rights, posters in company business offices, the mass media and also through intermediary groups including senior citizen service and advocacy organizations and their leaders.

Furthermore, each company is encouraged to devise new and innovative programs to meet the program objectives according to the specific needs of its elderly customers.