

Docket Number: EL18-012
Subject Matter: Second Data Request
Request to: NorthWestern Energy
Request from: South Dakota Public Utilities Commission Staff
Date of Request: 3/26/2018
Responses Due: 4/9/2018

- 2-1. Explain how NorthWestern is planning to alert the existing landlords about the new program and the terms and conditions?

Answer: For clarification, the general parameters of the program have been in place for more than 4 years. The process is simply becoming more defined with the implementation of our eCIS+ system. We are clarifying the entire relationship by providing a copy of a continuous service agreement to landlords detailing all the terms and conditions, instead of only providing a verbal overview of the essential components during the interaction. With the implementation of the online landlord portal, NWE will also offer an additional option to return service(s) to the landlord when the tenant's service(s) are scheduled for disconnection due to a non-pay situation. We intend to alert the existing landlords of the changes to the program, the new option and the free online self-service portal via outbound call campaigns, social media, alerts on the NWE website, presentations to landlord associations, interactions in our contact center and walk-in offices, and learning/enrollment sessions held at NWE facilities.

- 2-2. How will NorthWestern confirm that the 'old' landlords are agreeing to the new terms and conditions?

Answer: If we are not successful in reaching landlords by the methods stated above, NWE will identify any remaining landlords and request their acceptance of the clarified terms and conditions as a requirement to continue participating in the program. For the convenience of the landlords, they will be able to accept the updated terms and conditions online (through the self-service portal) or they can sign/return the written continuous service agreement. NWE intends to begin this notification process approximately 3 months after going live with the new online portal. Participation in the existing program will be cancelled if we do not receive a response (via online or signed agreement) within 60 days. At that time, NWE will cancel agreements where landlords have not agreed to the terms and conditions as described. NWE will provide additional final written notice to these landlords prior to the cancellation of program participation, identifying the date of the scheduled cancellation.

- 2-3. Refer to ARSD 20:10:20:02(1) and paragraph 2 on Section 6, Sheet No. 58. The last part of paragraph 2 appears to allow for refusal for debt from any class of service on the account and ARSD 20:10:20:02(1) says that to refuse service the debt cannot be for another class of service. Explain how paragraph 2 is in compliance with the PUC's rules.

Answer: The landlord is only held responsible for their own debt incurred. The landlord is never responsible for the debt of a tenant or the previous occupant.

2-4. Confirm that all new landlords who wish to participate in the program must sign the forms as shown in the tariff on pages 57 through 60s

Answer: Currently, landlords verbally agree to the general conditions of the continuous service program. Going forward, all new landlords will be required to sign and return the agreement in order to establish a continuous service relationship.

2-5. Refer to page 2 of the cover letter. Is the Landlord Portal up and working?

Answer: The portal is not available to the public. The portal is up and functioning for internal purposes. There are still some final testing to be completed before we are ready to present this portal to the public. We intend to have it available to public by the early part of May.