

REPORT TO THE CALIFORNIA
LEGISLATURE

REVIEW OF
ELECTRONIC INFORMAL COMPLAINT SUBMISSION
PROCEDURES IN ACCORDANCE WITH CALIFORNIA
PUBLIC UTILITIES CODE §311.4 AND §910.6

June 1, 2016

REPORT TO THE LEGISLATURE ON CPUC ELECTRONIC INFORMAL COMPLAINT SUBMISSION

I. PURPOSE OF REPORT

Senate Bill (SB) 531 (Stats. 1999, Ch. 327, Sec. 2 codified as Public Utilities (“P.U.”) Code §311.4), required the California Public Utilities Commission (“CPUC”) to devise and implement a procedure that allows consumers to submit informal complaints regarding utility service by electronic means.¹ P.U. Code 910.6 requires that “the [CPUC] annually review the procedures and the technology involved to ensure the continued effectiveness of the program, and report any findings to the Legislature.”² In compliance with these provisions, the purpose of the report herein is to provide the CPUC’s review of its electronic complaint submission process for the year 2015.

Informal complaints are received directly from utility customers and are processed by the Consumer Affairs Branch (“CAB”) within the CPUC’s Consumer Protection and Enforcement Division. This is in contrast to formal complaints, which are docketed at the CPUC and processed by the Administrative Law Judge Division.

CAB receives informal complaints via telephone, U.S. Mail and electronically (via the Internet or email). The complaints that CAB receives via telephone are not addressed in this report. For the remainder of this report the term “total written complaints” will be used to mean any and all informal complaints submitted to CAB via U.S. Mail or via electronic means. The terms “electronic complaints” will refer to the subset of the “total written complaints” submitted to CAB via the Internet or email.

II. REVIEW OF PROCEDURES AND TECHNOLOGY FOR THE FILING OF ELECTRONIC COMPLAINTS

In 1997, prior to the enactment of P.U. Code §311.4, the CPUC began accepting electronic submission of informal complaints via email. Beginning in 1999, the CPUC implemented systems to achieve the directives in §311.4, and began conducting an annual review of the technology, procedures, and effectiveness of its electronic complaint program. In 2003, the CPUC began to report the information required by §311.4 to the Legislature.

¹ According to this Code section, “electronic means” includes e-mail, the Internet, or both.

² P.U. Code 910 was established in order to provide one code section to cross reference all sections of the P.U. code where the CPUC was ordered to provide legislative reports. Thus, the reporting requirements that were formerly codified in P.U. Code 311.4(C) were transferred to P.U. Code 910.6.

In compliance with paragraphs (a) and (b) of § 311.4, the CPUC developed and implemented an Internet-based electronic complaint submission process, which went live in January 2002. As part of this effort, and in compliance with paragraph (h) of § 311.4, the CPUC implemented an Internet-based complaint form that allowed consumers to submit informal complaint information. This complaint form is easily accessible to consumers on the CPUC's website, is reviewed periodically, and is updated as necessary.³ Initially, the information from this form was transmitted via email to an electronic mailbox, from which the data then had to be extracted by staff in order to create an actual complaint in the CPUC's consumer complaint database.

With the introduction of a new database in November 2008, this process was further automated to allow the database to interface directly with the CPUC's website, thus enabling staff to download consumer complaint information with the click of a button. The information is then reviewed by CAB staff, and appropriate action is taken to resolve the informal complaint with the utility. These changes have made the processing of Internet-based consumer complaints more efficient and secure.

Figure 1: Screenshot of the Informal Complaint Form on the CPUC's Website

File a Complaint

Welcome to the California Public Utilities Commission Consumer Affairs Branch Website.

Using this page, you can file a complaint against the company that provides your telephone, energy (electric or gas), or water service.

I wish to follow up on a previously reported complaint:

Enter Complaint Number:

OR

I wish to file a new complaint. Please fill in the information requested below.
(Please do NOT report the same complaint for a case which is still pending.)

Note: If you have a Safety Related Issue (this includes safety of gas, electric, cable, phone and mobile home park utilities, such as live wires dangling from power poles, gas leaks etc.), please dial 911 and report the problem.

For other issues that you have been unable to resolve with the utility directly, please enter your complaint information below. All personal identifying information provided is confidential, and will be used solely for the purpose of resolving your complaint.

Items marked with an asterisk [*] are required.
Use the TAB key to move from field to field.

Service Contact and Location Information :

First Name * Last Name *

If the complaint pertains to your business, enter business name here:

Street * Unit

City * Email Address

State Can be reached at - -

Zip * - Home Phone - -

³ See <http://www.cpuc.ca.gov/cab/> and click on the “online complaint form” link.

The form allows consumers to enter relevant information for the complaint, their contact information and attach any documents that pertain to their complaint.

Furthermore, the CPUC as a whole has updated its website in 2015 to be in line with the look and feel of other state agency websites. This creates uniformity and familiarity for consumers navigating the CPUC website and other state websites. For CAB, the website update resulted in easier navigation to CAB's consumer complaint form and, thus, made it easier for the consumer to receive CAB assistance.

Figure 2: Screenshot of the CAB's web page on CPUC's Website



The Consumer Information Management System (“CIMS”) was designed to interface directly with the electronic complaint form submitted via the CPUC’s website, thereby eliminating several processing steps. Submitting complaints through electronic means has been beneficial for consumers as well as the CPUC. Interfacing the online complaint form with CIMS enables CAB to intake informal complaints entirely electronically allowing more efficient processing of complaints. This saves consumers money (i.e. mailing costs) as well as time. Another benefit is that CAB operates in a near-paperless environment with each complaint assigned a unique electronic case number and processed via secure web portals with the utility and the consumer.

The CPUC’s current process for submitting electronic complaints is user-friendly for consumers. Consumers are able to create their own complaint case, type in the necessary details, attach

any necessary documents, and send the complaint directly to CAB. Each electronic complaint is given a unique case number, and then assigned to a CAB Representative, who reviews the case details and works with the consumer and the utility toward a resolution.

In 2015, CAB staff and the utilities reported no significant problems with the processes or technology involved in the submitting and handling of electronic complaints. However, CAB staff sometimes assists consumers with minor issues as they learn how to use the online complaint form. For example, CAB staff report that consumers occasionally have difficulty submitting electronic complaints, either because they do not follow the instructions for submitting an electronic complaint correctly, or because of problems with their own computers. In these instances, CAB representatives “walk” consumers through the steps to make sure they are following them correctly and advise them to check with their Internet service provider and/or a computer consultant for assistance. Consumers can access assistance with submitting electronic complaints in a variety of languages by calling CAB’s toll free number.

III. HISTORICAL TREND

A measure of the success of this electronic complaint program is that the CPUC experienced year-to-year increases in the percentage of complaints that were received electronically in the first decade of the program. In the 1999-2000 timeframe, electronic complaints represented 10.3% of total written complaints. In the 2010-11 timeframe, electronic complaints increased up to 61.8%. Figure 3 represents the complaint data for the last five calendar years (2011-2015), broken down by total written and electronic complaints received as well as electronic complaints as a percentage of total written complaints.

Figure 3: Percentage of Electronic Complaints Table

Year	Total Written Complaints	Electronic Complaints	Electronic Complaints as a Percentage of Total Written Complaints
2011	16,564	9,979	60.3%
2012	14,465	8,475	58.6%
2013	11,036	6,579	59.6%
2014	10,434	6,514	62.4%
2015	11,232	7,080	63.0%

Although electronic complaints constitute 63.0% of total written complaints in 2015, the overall trend with the ratio of electronic complaints to total written complaints has been a slow increase over the five year period⁴.

IV. CONCLUSION

The CPUC's process and technology for filing informal complaints electronically continues to work effectively, with very few problems reported by consumers, the CPUC, or the utilities. With the introduction of the CIMS database in 2008, the CPUC's electronic complaint process was streamlined, resulting in more effective processing of informal complaints. The CPUC's 2015 website redesign has added accessibility to the electronic complaint form. These improvements continue to benefit consumers, and contribute to a substantial percentage of electronic complaints being submitted as a proportion of total complaints received by the CPUC. California consumers have become increasingly aware of and comfortable with the electronic complaint submission process. The CPUC's Informal Complaint process has been successfully implemented through electronic means. Equally important, CABs process remains available to the segments of the population that lack accessibility to technology or that still prefer to submit their written complaints by U.S. Mail.

⁴ The ratio of electronic to total written complaints will likely never reach 100 % as some segments of the California population prefer the U.S. Mail and/or vary in use of electronic devices to submit informal complaints online.