

MARYLAND-D.C. UTILITIES ASSOCIATION FALL CONFERENCE
CAROUSEL HOTEL
OCEAN CITY, MARYLAND

SEPTEMBER 23, 1988

REMARKS OF
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INTRODUCTION

APPROXIMATELY FOUR YEARS AGO AT YOUR 1984 FALL CONFERENCE I EXPRESSED THE OPINION THAT THE "WINDS OF CHANGE" WERE GATHERING FORCE IN THE ELECTRIC ENERGY MARKETPLACE. I DISCUSSED WITH YOU THAT UNEXPECTEDLY LARGE RESERVE MARGINS HAD MADE THE MARKET FOR BULK POWER AND UNIT POWER SALES HIGHLY COMPETITIVE. I DESCRIBED THE AGGRESSIVE POSTURE THAT THE NATURAL GAS DISTRIBUTORS WERE TAKING IN LIGHT OF THE REALIZATION THAT LONG-TERM SUPPLY OF NATURAL GAS WAS A REALITY. I TALKED OF THE GAS INDUSTRY'S 1983 ADVERTIZING CAMPAIGN WHICH WAS SPECIFICALLY GEARED TO OBTAINING A LARGER MARKET SHARE OF THE RESIDENTIAL SPACE AND WATER HEATING CUSTOMERS, AND THE GAS INDUSTRY'S ACTIVE COURTSHIP OF THE VOLUME USERS, THE COMMERCIAL AND INDUSTRIAL CLASSES.

MY MESSAGE IN THE "WINDS OF CHANGE" SPEECH WAS CLEAR AND DIRECT, FOR I STATED:

"UTILITY EXECUTIVES MUST POSTURE THEMSELVES IN A PROACTIVE AND NOT A REACTIVE MODE. THEY MUST INTERPRET THESE ECONOMIC TRENDS AS INSPIRATIONAL AS OPPOSED TO LIMITING."

I CAUTIONED:

"THE PROBLEM IS STRAIGHT-FORWARD: MOST UTILITY COMPANIES ARE NOT MANAGING THEIR BUSINESSES AS A MARKET ENTERPRISE. IN AN INDUSTRY THAT IS SO CUSTOMER PERVASIVE, THE KEY ISSUES COMMONLY DESCRIBED BY UTILITY EXECUTIVES ARE MAXIMIZING THEIR RATE AWARDS, BRINGING

NEW PLANTS ON LINE SPEEDILY AND MAINTAINING DIVIDEND INCREASES FOR THEIR STOCKHOLDERS. VERY LITTLE IS EVER SAID ABOUT THE "CUSTOMERS".

WELL, IT IS FOUR YEARS LATER AND INTERESTINGLY ROBERT W. SCHERER, FORMER CHAIRMAN OF THE EDISON ELECTRIC INSTITUTE, IN A RECENT FORTNIGHTLY ARTICLE STATED THAT "AROUND US SWIRLS A WHIRLWIND OF CHANGE." 1/ I WHOLEHEARTEDLY AGREE. WHAT BEGAN IN 1968 WITH THE TELECOMMUNICATIONS INDUSTRY HAS NOW CLEARLY SPREAD TO THE ELECTRIC AND GAS INDUSTRIES.

UNTIL 1968, CONNECTION TO THE PUBLIC NETWORK OF ANY PIECE OF EQUIPMENT NOT PROVIDED BY THE TELEPHONE COMPANY WAS PROHIBITED BY THE "FOREIGN ATTACHMENT PROVISION" OF TARIFF NO. 263. THE RATIONALE FOR THIS BAN WAS THAT INTERCONNECTION OF EQUIPMENT OF UNDETERMINED ORIGIN AND QUALITY MIGHT INJURE THE NETWORK AS A WHOLE. THE FEDERAL COMMUNICATIONS COMMISSION (FCC) STRUCK DOWN THIS TARIFF IN ITS CARTERPHONE DECISION. THE FCC HELD THAT CUSTOMERS HAD A RIGHT TO THE UNIMPEDED USE OF THEIR OWN EQUIPMENT AND THAT THE BELL SYSTEM COULD MORE APPROPRIATELY PROTECT THE TELEPHONE NETWORK FROM HARM BY ESTABLISHING STANDARDS TO BE MET BY INTERCONNECTION DEVICES. 2/ THIS DECISION HERALDED THE OPENING OF THE NETWORK, DIVESTITURE AND THE BIRTH OF MCI, U.S. SPRINT, AND OTHERS. NOW, THE COMPETITIVE HAMMER WHICH SMASHED AT&T INTO SMALLER AND SUPPOSEDLY EASIER TO HANDLE PIECES IS NOW BEING WIELDED BY THE FEDERAL ENERGY REGULATORY COMMISSION (FERC) TO CREATE SIMILAR CHAOS IN THE ELECTRICITY AND GAS INDUSTRIES.

COMPETITION

THE FERC HAS CLEARLY AND STEADFASTLY MOVED IN THE DIRECTION OF DEREGULATING GAS AND ELECTRIC RATES. 3/ IN 1985, FERC ISSUED ORDER NO. 436 WHICH ADVOCATED A SYSTEM THAT ALLOWED PIPELINES TO TRANSPORT GAS FOR DIRECT SALE FROM THE PRODUCER TO THE CONSUMER. 4/ IN ADVOCATING THIS POSITION, FERC NOTED THAT A HIGHLY COMPETITIVE AND RAPIDLY GROWING SPOT MARKET HAD EVOLVED, THAT PIPELINE-TO-PIPELINE COMPETITION WAS OFTEN AVAILABLE AND THAT THERE WAS NOW AN INTERCONNECTED NATIONWIDE PIPELINE GRID. FERC CHARACTERIZED THE INDUSTRY AS "WORKABLY COMPETITIVE" AND ATTEMPTED TO PROVIDE THE APPROPRIATE AND NECESSARY REGULATORY FRAMEWORK NEEDED. 5/

ON THE ELECTRIC SIDE, PURPA, PASSED IN 1978, ACCELERATED THE GROWTH OF INDEPENDENT POWER PRODUCERS (IPPS), SUCH AS COGENERATORS. 6/ NOW, FERC IS CONSIDERING RELAXING THE QUALIFICATION STANDARDS FOR QUALIFYING FACILITIES AND RELAXING REGULATION OF IPPS. 7/ THERE IS ALSO NOW THE DISCUSSION OF MANDATORY WHEELING.

MEANWHILE, THE FEDERAL COMMUNICATIONS COMMISSION (FCC) IS DOING ALL THAT IT CAN TO ENCOURAGE COMPETITION IN THE TELECOMMUNICATIONS AREA WITH COMPUTER I, II, AND III, ONA, CEI AND, MOST RECENTLY WITH ITS INFAMOUS "PRICE CAP" PROPOSAL.

AROUND US SWIRLS A WHIRLWIND OF CHANGE.

SOME OF THESE CHANGES HAVE BEEN POSITIVE, OFFERING CUSTOMERS VIABLE ALTERNATIVES AND VARYING PRICES. HOWEVER, REGULATORY REFORM HAS ALSO BROUGHT ABOUT NEW COMPLEXITIES AND GREATER CHALLENGES FOR STATE REGULATORS. ONE OF THE RESULTS OF INCREASED COMPETITION HAS BEEN THE DEVELOPMENT OF BYPASS.

BYPASS

REGULATED UTILITIES HAVE RECENTLY RAISED THE CRY THAT THEY ARE LOSING CUSTOMERS TO BYPASS BECAUSE STATE REGULATORS WILL NOT ALLOW THEM THE NEEDED FLEXIBILITY TO BASE THEIR PRICES ON COSTS. I WILL NOT ATTEMPT TODAY TO DISCUSS THE ORIGINS OR DEGREE OF BYPASS. HOWEVER, FOR WHATEVER THE REASON, OR TO WHATEVER DEGREE IT EXISTS, BYPASS HAS BECOME A SERIOUS CONCERN FOR THE UTILITY INDUSTRY AS A WHOLE.

FOR EXAMPLE, SAN DIEGO GAS AND ELECTRIC LOST 8% OF ITS COMMERCIAL AND INDUSTRIAL MARKET TO BYPASS BETWEEN 1982 AND 1987. IT HAS PROJECTED THAT IT COULD LOSE ANOTHER 12% BY 1991. 8/

A SPOKESPERSON FOR THE UTILITY STATED THAT 25% OF AMERICA'S COGENERATORS ARE IN ITS SERVICE TERRITORY. IN ORDER TO REMAIN COMPETITIVE, THE COMPANY HAS PURSUED A COMBINATION OF COST-BASED PRICING AND MARKETING PROGRAMS. THE MARKETING PROGRAM CONSISTS OF SIMPLY FINDING OUT WHAT THE CUSTOMER WANTS AND PROVIDING IT.

PACIFIC GAS AND ELECTRIC FACES POTENTIAL LOST REVENUES OF APPROXIMATELY \$300 MILLION BY 1990 AS A RESULT OF BYPASS/COGENERATION. 9/

NORTHEAST UTILITIES IN CONNECTICUT ESTIMATES THAT IT COULD LOSE 15% - 20% OF ITS BASE LOAD TO VARIOUS FORMS OF COMPETITION. 10/

BELL ATLANTIC RECENTLY FILED DATA WITH THE FCC WHICH INDICATED THAT IT COULD LOSE APPROXIMATELY \$858 MILLION IN REVENUE AS A RESULT OF UNECONOMIC BYPASS, 11/ THOUGH I HAVE SOME PROBLEMS WITH THE METHODOLOGY USED IN ARRIVING AT THESE NUMBERS.

CUSTOMERS DECIDE TO BYPASS FOR A VARIETY OF REASONS. I HAVE MY OWN OPINION. HOWEVER, AS AN INDUSTRY YOU HAVE RECOGNIZED THAT ONE OF THE MAJOR REASONS IS A LACK OF CUSTOMER SATISFACTION. SOUTHERN CALIFORNIA EDISON, SAN DIEGO GAS AND ELECTRIC, PACIFIC GAS AND ELECTRIC, BALTIMORE GAS AND ELECTRIC, CINCINNATI GAS AND ELECTRIC, THE ARIZONA PUBLIC SERVICE COMPANY, PENNSYLVANIA POWER AND LIGHT, AND NORTHEAST UTILITIES HAVE ALL IMPLEMENTED PLANS TO MINIMIZE BYPASS BY IMPROVING, OF ALL THINGS, CUSTOMER SERVICE. A KEY ELEMENT OF THESE PLANS IS TO BECOME MORE MARKET ORIENTED. 12/

AS I EMPHASIZED IN MY TALK WITH YOU FOUR YEARS AGO:

"NO COMPANY, NO MATTER WHAT INDUSTRY IT IS IN, CAN SUCCEED WITHOUT MARKETING AND WITHOUT BEING COMMITTED

TO SATISFYING AN ALWAYS CHANGING SET OF CUSTOMERS NEEDS AND REQUIREMENTS. WHAT MUST BE APPRECIATED AND ACCEPTED TODAY IS THAT AS COMPETITIVE FORCES IN THE INDUSTRY BUILD AND AS THE BATTLE FOR CUSTOMERS' BUSINESS INTENSIFIES, IT WILL BE ABSOLUTELY ESSENTIAL TO APPROACH THE MARKETPLACE WITH A CREATIVE MARKETING STRATEGY. UTILITIES WILL HAVE TO GENERATE THEIR REVENUES AND PROFITS THE OLD-FASHION WAY. THEY WILL HAVE TO GIVE CONSISTENT AND MEANINGFUL ATTENTION TO CUSTOMERS' NEEDS."

SALES V MARKETING

WHILE SALES ARE IMPORTANT, THEY ARE SHORT-TERM AND ONLY A SHORT-SIGHTED COMPANY WOULD GIVE SALES THE HIGHEST PRIORITY. A MARKET ORIENTED COMPANY FINDS OUT WHAT THE CUSTOMER WANTS OVER THE LONG-TERM AND WORKS WITH THE CUSTOMER TO ACHIEVE THAT GOAL. ^{13/} IN MY OPINION, IF YOU CONCENTRATE ON MARKETING, SALES SHOULD TAKE CARE OF ITSELF.

TO A LARGE DEGREE, AS AN INDUSTRY YOU HAVE ALREADY MOVED TOWARD ESTABLISHING A MARKET CULTURE AND THE MAJORITY OF UTILITY MARKETING IS TARGETED TO THE BUSINESS COMMUNITY. ^{14/} I SUGGEST, NO I STRONGLY URGE, HOWEVER, THAT RESIDENTIAL CUSTOMERS BE INCLUDED IN THIS NEW MARKETING ORIENTATION. SINCE THESE CUSTOMERS USUALLY DO NOT INTERACT WITH YOUR SALES OR MARKETING

PEOPLE BUT INSTEAD THROUGH YOUR CUSTOMER SERVICE OFFICE, THEIR PERCEPTION OF THE CUSTOMER SERVICE REPRESENTATIVE ON THE TELEPHONE WILL BE THEIR PERCEPTION OF YOUR COMPANY.

CUSTOMER SERVICE

ON AUGUST 18, 1988, THE WASHINGTON POST RAN AN ARTICLE ENTITLED, "TEMPERS RISE AS OUTAGE CONTINUES" IN WHICH A CUSTOMER DESCRIBED PEPCO'S CUSTOMER SERVICE REPRESENTATIVE AS "RUDE AND OBNOXIOUS".

I WANTED TO FIND OUT FIRSTHAND HOW A UTILITY EMPLOYEE RESPONDED TO A CUSTOMER. SO, I RECENTLY HAD SEVERAL STAFF MEMBERS CALL THE LOCAL UTILITIES IN MY JURISDICTION WITH AN INQUIRY OR A COMPLAINT. ALL OF THE COMPANIES ANSWERED THE TELEPHONE PROMPTLY (BY THE THIRD RING) AND MOST OF THE EMPLOYEES WERE HELPFUL AND COURTEOUS.

HOWEVER, THE STAFF MEMBERS REPORTED THAT ALL OF THE CUSTOMER SERVICE REPRESENTATIVES APPEARED TO BE IN A HURRY TO TERMINATE THE CONVERSATION. THE REPRESENTATIVE ASKED QUESTIONS QUICKLY AND GAVE ABBREVIATED RESPONSES. MY STAFF BELIEVED THAT THIS "TIME IS OF THE ESSENCE" ATTITUDE WAS TOO WIDESPREAD TO BE ATTRIBUTED SOLELY TO EFFICIENCY. WE SURMISED THAT THE AMOUNT OF TIME SPENT DEALING WITH A CUSTOMER WAS SOMEHOW TIED TO THE EMPLOYEE'S PERFORMANCE EVALUATION, WITH THE MINIMUM CONTACT ELICITING THE MAXIMUM BENEFIT FOR THE EMPLOYEE. THIS IS HARDLY CONDUCIVE TO

OPTIMAL CUSTOMER/COMPANY RELATIONS.

YOUR CUSTOMER SERVICE PEOPLE ARE YOUR BEST OPPORTUNITY TO MARKET YOUR SERVICES AND ENHANCE YOUR IMAGE. THEREFORE, THEY MUST BE MOTIVATED, SATISFIED AND, MORE IMPORTANTLY, INFORMED. 15/ HOW WELL ARE THEY TRAINED? DO THEY HAVE A STAKE IN THE SUCCESS OF THE COMPANY? DO YOU HAVE AN EFFECTIVE PERFORMANCE COMPENSATION PROGRAM? DO THEY KNOW WHEN YOU'VE FILED A RATE APPLICATION AND WHY? DO YOU AT LEAST APPRISE THEM OF THE FILINGS THAT ARE LIKELY TO GENERATE CALLS SO THAT THEY WILL HAVE THE ABILITY TO BE RESPONSIVE? FLORIDA POWER CORPORATION AUTOMATED ITS ENTIRE RATE CASE FILING, INDEXED BY SUBJECT, AND HAD IT SENT OUT COMPANY WIDE. ALL EMPLOYEES HAD ACCESS AND KNEW THE COMPANY'S POSITION ON EACH ASPECT OF THE RATE CASE.

SOUTHERN CALIFORNIA GAS COMPANY HAS A TRAINING PROGRAM FOR ITS CUSTOMER SERVICE EMPLOYEES WHICH ALLOWS IT TO MEASURE INTERACTION WITH CUSTOMERS ON TWENTY DIFFERENT DIMENSIONS OF SERVICE.

PACIFIC GAS AND ELECTRIC HAS A DATA BASE WHICH ANNUALLY MEASURES CUSTOMER SATISFACTION. RESULTS OF A MAILED-OUT QUESTIONNAIRE ARE COMPUTERIZED AND USED AS A DIAGNOSTIC TOOL BY MANAGEMENT TO DISCOVER AREAS OF DISSATISFACTION. 16/

IN THE DISTRICT OF COLUMBIA I NOTE THAT WHILE AROUND US

"SWIRLS A WHIRLWIND OF CHANGES" SINCE 1984, DCNG WITH A RESIDENTIAL CUSTOMER BASE OF APPROXIMATELY 130,000, HAS ONLY INCREASED ITS CUSTOMER SERVICE COMPLEMENT FROM 37 TO 43 EMPLOYEES (A PERCENTAGE INCREASE OF ONLY 16%). WHILE TELEPHONE COMPLAINTS AND INQUIRIES AT DCNG HAVE INCREASED FROM 430,000 IN 1984 TO 600,000 IN 1988. PEPCO, SYSTEM-WIDE, WITH A RESIDENTIAL CUSTOMER BASE OF APPROXIMATELY 620,000 HAS ONLY INCREASED ITS NUMBER OF CUSTOMER SERVICE REPRESENTATIVES FROM 160 IN 1984 TO 166 IN 1988. (A PERCENTAGE INCREASE OF SOME 3.8%). HOWEVER, THE NUMBER OF TELEPHONE COMPLAINTS AND INQUIRIES HAVE INCREASED FROM 955,000 IN 1984 TO 1.1 MILLION IN 1988 (AN INCREASE OF 20.4 %). WHILE C&P OF THE DISTRICT, WITH 279,274 RESIDENTIAL LINES AND A VETERAN OF REGULATORY REFORM HAS INCREASED ITS CUSTOMER SERVICES DIVISION FROM 211 IN 1984 TO 281 IN 1988.

COMPLAINTS AND INQUIRIES FROM CUSTOMERS SHOULD NOT BE VIEWED AS A PROBLEM TO BE DEALT WITH, BUT AS AN OPPORTUNITY FOR COMPANY ENHANCEMENT. MANAGERS SHOULD NOT WAIT FOR AN UNRESOLVED COMPLAINT TO RISE TO THEIR LEVEL. THEY SHOULD NOT ONLY RANDOMLY SAMPLE CALLS TO THE CUSTOMER SERVICE DEPARTMENT BUT SHOULD ALSO CONTACT THE CUSTOMER TO DETERMINE WHETHER THE CUSTOMER IS SATISFIED.

TAKE THE INITIATIVE TO RESOLVE WHATEVER AREA GENERATES A SIGNIFICANT NUMBER OF COMPLAINTS. I KNOW THAT ONE OF THESE AREAS IS THE CUSTOMER WHO MUST MISS WORK TO RECEIVE A SERVICE CALL. TELLING A CUSTOMER THAT A REPRESENTATIVE WILL ARRIVE BETWEEN 9:00

A.M. AND 5:00 P.M. IS NO LONGER ACCEPTABLE IN TODAY'S SOCIETY. ONLY 8% OF AMERICAN HOUSEHOLDS REGULARLY HAVE AN ADULT AT HOME DURING THESE HOURS. 17/ WHY NOT ADAPT TO THE CUSTOMER'S SCHEDULE BY MAKING THESE TYPES OF CALLS IN THE EVENING AND ON WEEKENDS? IF THE CUSTOMER REMAINS HOME AND THE REPRESENTATIVE NEVER ARRIVES, YOU NEED TO DO MORE THAN RESCHEDULE BECAUSE YOU NOW HAVE A DISSATISFIED CUSTOMER.

PUBLIC RELATIONS, PUBLIC AFFAIRS, CUSTOMER RELATIONS AND COMMUNITY SERVICES SHOULD BE VIEWED, IN MY OPINION, AS INTEGRAL ELEMENTS OF YOUR MARKETING PROGRAM.

AS DESCRIBED BY DAVID LEFTWICH IN AN AUGUST FORTNIGHTLY ARTICLE, EACH UTILITY MUST DEVELOP AN APPROPRIATE MARKETING MIX AND, ONCE ESTABLISHED, MUST BE PACKAGED FOR ACCEPTANCE BY EACH OF ITS MAJOR STAKEHOLDERS. THE FIRST AND FOREMOST, STAKEHOLDER, MR. LEFTWICH RECOGNIZED WAS THE "COMMISSION", STATING THAT THE REGULATOR HAD TO BE CONVINCED THAT THE MARKETING MIX BEING PROPOSED WAS IN THE BEST INTEREST OF THE RATEPAYER. HE ACKNOWLEDGED THAT THIS TASK WAS NOT A SIMPLE OR QUICK ACCOMPLISHMENT AND HAD, PERHAPS, SOME OBLIGATORY TRADE-OFF, BUT STATED UNCATEGORICALLY, THAT MOVING FORWARD WITH YOUR REGULATORS TO IMPLEMENT YOUR WELL-CONCEIVED MARKETING MIX IS BOTH ESSENTIAL AND POSSIBLE. THE SECOND MAJOR STAKEHOLDER GROUP MR. LEFTWICH DISCUSSED WAS THE RATEPAYER OR CUSTOMER. HE EXPLAINED THAT EACH SEGMENT OF THIS GROUP HAS A SPECTRUM OF NEEDS AND DESIRES, AND THAT MARKETING STRATEGY SHOULD ADDRESS SPECIFICALLY THESE

DIFFERENTIATIONS. AT THE VERY LEAST, THE AUTHOR SUGGESTS, INSTITUTIONAL ADVERTISING ON THE THEMES, "YOUR UTILITY IS GOOD" OR "AREN'T WE RELIABLE" SHOULD BE SCRAPPED IN FAVOR OF MORE FOCUSED MESSAGES THAT THE TARGET SUB-SEGMENTS ARE MORE LIKELY TO FIND PERSUASIVE. THE MIXED MAJORITY STAKEHOLDER GROUP, AS EXPLAINED BY THE AUTHOR, IS WHAT HE TERMED THE "UNDERPRIVILEGED" RATEPAYER. HE THOUGHT IT UNQUESTIONABLE THAT UTILITIES AND COMMISSIONS WOULD WANT TO SAFEGUARD REASONABLE LIVING STANDARDS AND RECOMMENDED "CRUCIAL WELFARE" AS AN INTEGRAL PART OF EVERYONE'S UTILITY MARKETING MIX. 18/

CONCLUSION

THE BATTLE TO RETAIN CURRENT CUSTOMERS AND OBTAIN NEW ONES WILL BE FOUGHT, IN MY OPINION, IN THE AREA OF CUSTOMER SERVICE 19/ AND I CAUTION YOU NOT TO TAKE YOUR RESIDENTIAL CUSTOMERS FOR GRANTED. YOU MAY BELIEVE THAT RESIDENTIAL CUSTOMERS WILL ALWAYS BE THERE BECAUSE THEY HAVE NO ALTERNATIVE. THAT IS TRUE FOR NOW, BUT I WOULD REMIND YOU THAT THERE WAS ONCE A TIME WHEN THERE WAS NO ALTERNATIVE TO AT&T. "THE MANAGEMENT OF ANY ORGANIZATION THAT RELIES TOO HEAVILY ON TRADITIONAL KNOWLEDGE, OR CLINGS TO PAST METHODS OF SUCCESS, WILL GRADUALLY DECLINE AND FALL. THE MANAGEMENT THAT SUCCEEDS IN THE NEXT DECADE WILL BE ONE THAT EMBRACES CHANGE AND SEEKS NEW WAYS OF MEETING THE CUSTOMER'S CHANGING NEEDS." 20/

Footnotes

1. Scherer, "Powering America to a More Productive Future", Public Utilities Fortnightly, June 9, 1988, p. 17
2. In the Matter of Use of the Caterfone Device, 13 FCC 2d 420 (1968); See also, U.S. v AT&T, 524 F. Supp. 1336 (1981)
3. "FERC Steering Steady Course Toward Deregulation", Public Utilities Fortnightly, July 9, 1987, p. 30
4. Schuller, "Managing in a Quasi-Deregulated Gas Market", Public Utilities Fortnightly, October 1, 1987 p. 22
5. FERC Order No. 436, 50 Federal Register 42408 (1985)
6. Grusky & Sioshansi, "Beyond Demand Side Management", Public Utilities Fortnightly, August 20, 1987, p. 23
7. See, "Competitive Bidding and Independent Power Producers", Public Utilities Fortnightly, November 26, 1987, p. 43 and "FERC Opens Pandora's Box", Public Utilities Fortnightly, March 3, 1988, p. 22
8. "Customer Migration", Public Utilities Fortnightly, June 9, 1988 p. 106
9. Id.
10. Id.
11. See June 1988 Monitoring Report, CC Docket No. 87-339, p. 235
12. See "Customer Migration", Public Utilities Fortnightly June 9, 1988 p. 106
13. See, Lefkowitz, "The Dangerous Challenge of Utility Marketing", Public Utilities Fortnightly August 18, 1988, p. 9

14. Delene, "Marketing Public Utilities to the Public", Public Utilities Fortnightly, July 21, 1988, p. 27
15. Id.
16. Id.
17. Id.
18. Lefkowitz, "The Dangerous Challenge of Utility Marketing", Public Utilities Fortnightly, August 18, 1988, p.9.
19. Budd, "Getting the Most Out of Customer Service", Public Utilities Fortnightly, June 23, 1988 p. 13
20. See Public Utilities Fortnightly, April 14, 1988, p. 10