

**IN THE MATTER OF THE APPLICATION
OF VEOLIA WATER IDAHO, INC. FOR A
GENERAL RATE CASE**

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2023 FEB 15 PM 4:57

NO. VEO-W-2

DIRECT TESTIMONY OF JOLENE BOSSARD

IDAHO PUBLIC UTILITIES COMMISSION

FEBRUARY 15, 2023

1 Q. Please state your name and business address.

2 A. My name is Jolene Bossard. My business address
3 is 11331 W. Chinden Blvd., BLDG 8, STE 201-A, Boise, Idaho
4 83714.

5 Q. By whom are you employed and in what capacity?

6 A. I am employed by the Idaho Public Utilities
7 Commission ("Commission") as a Utilities Compliance
8 Investigator in the Utilities Division.

9 Q. Please describe your educational background and
10 professional experience.

11 A. My educational background and professional
12 experiences are shown in Exhibit No. 136.

13 Q. What is the purpose of your testimony in this
14 proceeding?

15 A. The purpose of my testimony is to present the
16 Commission Staff's ("Staff") position on the following
17 consumer issues regarding Veolia Water Idaho, Inc.'s
18 ("Veolia" or "Company") general rate case:

19 1. The Customer Notice and Press Release filed in
20 this case;

21 2. Reviewing the customer workshop;

22 3. Summarizing the customer comments received by the
23
24
25

1 Commission regarding this case;

2 4. Discussing the complaints received by the
3 Commission for the years 2020 through 2022;

4 5. Customer Service Center performance;

5 6. Discussing Consumer Assistance Staff's stance on
6 Veolia Cares (Low-income Assistance program);

7 7. Discussing Consumer Assistance Staff's stance on
8 the Cross Connection Control Program; and

9 8. Reviewing East first Bench Discolored Water &
10 Flushing Credits.

11 Q. Are you sponsoring any exhibits with your
12 testimony?

13 A. Yes. I am sponsoring Exhibit Nos. 136, 137, 138,
14 139, 140, and 141.

15 Q. Please summarize Staff's recommendations as they
16 relate to consumer issues.

17 A. I recommend that the Company submit the customer
18 notice and press release to the Commission for review prior
19 to submitting its Application in future cases.

20 I reviewed the customer comments and found that
21 the number of comments received by the Commission in this
22 case has increased from the previous case. The customers
23
24
25

1 appear in their comments to be even more frustrated and
2 angry at the prospect of paying more for water. Many
3 customers object to the cost of the Eagle Water purchase
4 being imposed on all customers.

5
6 I reviewed complaints/inquires submitted to the
7 Commission and recommend that in the future, the Company
8 communicate with the Commission when it recognizes a
9 possible issue that could generate complaints from a
10 significant number of customers.

11 I address the previous lack of record keeping in
12 the Veolia Cares program and recommend that the Company
13 continue to support the program and to increase the amount
14 of the grant to reflect the increase in rates for
15 residential customers.
16

17 I reviewed the status of the Company's Cross
18 Connection Control Program and recommend that it take steps
19 to improve tracking the annual certification reports and
20 follow-up with customers when they are not submitted.

21 **Customer Relations**

22 **Customer Notification and Customer Workshop**

23 Q. Does the Company's Customer Notice and Press
24 Release meet the requirements of the Commission's Rules of
25

1 Procedure, (IDAPA 31.01.01), Rule 125?

2 A. No. The Company's Customer Notice and Press
3 Release were submitted on September 30, 2022, along with
4 the Application, and were reviewed by Staff at that time.
5 The customer notice failed to identify the case number,
6 although customers could locate the information if they
7 used the Commission's website. The Press Release failed to
8 inform Customers that they could file comments on the case;
9 however, all customers received the information with the
10 Customer Notice.
11

12 Q. How were the Company's customers informed of the
13 rate case?
14

15 A. Because the Company bills on a bimonthly
16 schedule, the first group of customers were sent notice in
17 the October 2022 billing statements, and the final group of
18 customers were sent a copy of the notice enclosed in the
19 November 2022 billing statements. Customers who receive
20 their billing statements electronically have a link to the
21 notice when they open their billing statement. All
22 customers should have received notice of the Application by
23 the end of November giving them sufficient opportunity to
24 submit written comments and participate in the process.
25

1 In addition to the customer notice and press
2 release, Staff hosted a virtual Customer Workshop on
3 January 31, 2023. Twenty-one (21) customers attended.

4 **Customer Comments Regarding the Proposed Rate Increase**

5
6 Q. Have you reviewed the written customer comments
7 that have been received by the Commission regarding this
8 case?

9 A. Yes. As of February 14, 2023, 134 customers have
10 submitted comments regarding the proposed increase in
11 rates. The comments are primarily from residential
12 customers who oppose any increase in rates.

13 Q. What are some of the concerns mentioned by
14 customers?

15
16 A. Commenters raise the same issues as have been
17 raised in prior rate cases. Many customers are low-income
18 or fixed-income customers who see basic living costs rising
19 due to increased inflation but their wages and/or social
20 security income benefits are not keeping pace.

21 Q. Are there other concerns mentioned by customers?

22 A. Many comments (66 of 134) bring up the cost of
23 the Company's acquisition of Eagle Water and the costs
24 associated with the purchase being passed on to all
25

1 customers.

2 **Customer Complaints and Inquiries**

3 Q. Please describe how many and what type of
4 complaints and inquiries the Commission has received
5 regarding the Company between 2020 and 2022.
6

7 A. Exhibit No. 137 shows the number of informal
8 complaints and inquiries received over the past three
9 years.

10 Q. Recently, have there been any specific complaints
11 that were different than a typical complaint the Commission
12 receives.

13 A. Yes. According to the Company, 1,136 customers'
14 accounts were affected when their meters were misread
15 (underread) over several months. This equated to a little
16 over 1% of the Customer base. The Company has been
17 rebilling these customers in a manner so that the
18 adjustment of the usage on the accounts will not affect
19 their sewer billing. As of 1/24/2023, the last of the
20 customers meters that were previously misread, now have
21 verified good meter readings. In the future, I recommend
22 that the Company notify Staff as soon as they recognize a
23 potential large-scale issue that will affect customers.
24
25

1 Call Center Telephone Answering Standards (often referred
2 to as "service levels")

3 Q. What is Veolia's performance objectives for
4 handling incoming calls?

5 A. Veolia's goal is to answer 80% of customer calls
6 within 60 seconds or less.

7 Q. Has Veolia met their standards of Average Speed
8 of Answer ("ASA")?

9 A. Yes, until recently. Since January 2020 Veolia
10 met their standards of Average Speed except for August,
11 September, and October 2022. Exhibit No. 138.

12 Q. What were Veolia's total number of incoming calls
13 and emails during each of the past 3 years?

14 A. The yearly totals were 83,994 in 2020, 86,191 in
15 2021, and 96,617 in 2022. Exhibit No. 139.

16 Veolia Cares

17 Q. Does Staff have any recommendations for the
18 Company in light of the customer concerns regarding higher
19 rates and income restraints?

20 A. A review of the Veolia Cares program over the
21 past three years indicates that the program was valuable to
22 low-income customers during the recent COVID pandemic.

1 While the number of disconnections for customers who had
2 received assistance increased during the pandemic, the
3 recovery in 2022 reduced both the amount of assistance
4 provided and the number of customers who were disconnected,
5 even after assistance was received. Exhibit No. 140.
6

7 Recently inflation has increased costs and has
8 subsequently increased the level of benefits available to
9 low-income customers who receive benefits. Staff
10 recommends that the Company increase the amount of
11 assistance an individual customer can receive in the same
12 percentage as the rate increase for residential customers
13 granted in the final order to reduce the effects of the
14 rate increase and higher inflation levels.
15

16 Staff also recommends that the Company increase
17 the maximum household income level to reach more customers
18 threatened by disconnection for non-payment and prevent
19 additional disruption of customer service. The program
20 qualifies customers through El-Ada Community Action
21 Partnership, which also handles other low-income programs
22 such as Energy Assistance and Crisis Funds, both of which
23 are part of the federally sponsored LIHEAP program, meaning
24 that the agency has the means and the ability to assess the
25

1 household income and determine whether it qualifies.
2 Raising the income level would allow more households with
3 marginal income to receive benefits.

4 **Cross Connection Control Program**

5 Q. What is the Company's Cross Connection Control
6 Program.
7

8 A. The Company's authority for the program falls
9 under the Idaho Rules for Public Drinking Water (IDAPA
10 58.01.08) administered by the Idaho Department of
11 Environmental Quality, Idaho's Uniform Plumbing Codes, and
12 the Commission's Rules and Regulations. The Company is
13 required to locate cross connections and determine suitable
14 protection to ensure that non-potable water cannot flow
15 back into the Company system. The Company must approve the
16 installation and requires annual inspection. To that end,
17 the customer with such a device is required to have the
18 device tested and the inspection results forwarded to the
19 Company. Should a customer fail to install and maintain
20 the proper device, including the annual inspection, the
21 Company has the authority to take steps to disconnect the
22 customer. See Order No. 33436. In 2019, the Company
23 revised its Cross Connection Control Program.
24
25

1 Q. What is the current status of the program?

2 A. Although the number of customers has increased
3 over the past three years, the number of annual inspection
4 reports received by the Company has decreased from 1,759 in
5 2020, to 1,228 in 2021, to 1,015 in 2022 (as of November).
6 The Company does not track the total number of customers
7 with a Cross Connection Control Device (CCD)
8 electronically, maintaining only a paper data base. It
9 does not track how many customers have been disconnected
10 and does not follow up on customers who have previously
11 submitted a certificate. In addition, the Company call
12 center personnel do not have access to the information
13 should a customer call to make an inquiry.
14

15 Q. How does the Company notify customers that they
16 need to submit an annual inspection certificate.
17

18 A. The Company includes a reminder to all customers
19 in its Annual Summary of Rules through billing inserts and
20 through its website because it doesn't have the ability to
21 target customers who have previously submitted a
22 certificate.
23

24 Q. Does the Staff have any recommendations for the
25 Company in light of the lack of recordkeeping?

1 A. Staff recommends that the Company create an
2 electronic database for all customers who have previously
3 submitted a certificate and all other customers, both new
4 construction and current customers, who are required to
5 maintain a CCD but may not have a device installed. The
6 Company could then use the database to track certificates
7 and notify customers who have not submitted the required
8 certificate. The program has a notification process to
9 enforce the requirement or if necessary to disconnect the
10 customer. Staff recommends that it increase efforts to
11 ensure compliance and prevent cross-contamination of its
12 system.
13

14 **Boise East First Bench Discolored Water**

15 Q. Please provide information on the discolored
16 water on the East First Bench ("EFB") for January 2020
17 through October 2022.
18

19 A. There was a total of 66 discolored water reports
20 with a flushing credit applied. The total amount of
21 flushing credits was \$99.00. Exhibit No. 141. The number
22 of calls has gone down every year, with the exception of a
23 spike in November of 2021, which was correlated to when the
24 Company was performing Ice Pigging on the lines.
25

1 Company Documents

2 Q. Have Veolia's forms required by the Utility
3 Customer Relations Rules (UCRR) (IDAPA 31.21.01) been
4 reviewed for compliance?

5 A. Yes. Veolia's forms were reviewed and determined
6 to meet the requirements of the UCRR.
7

8 Q. Does Staff support the Company's proposed updates
9 to the language included in the tariffs?

10 A. Yes. Staff has reviewed the Company's proposed
11 changes and supports updating the language. The actual
12 rates to be included in the tariffs will be determined by
13 the Commission.
14

15 Q. Does this conclude your testimony in this
16 proceeding?

17 A. Yes, it does.
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Professional Qualifications
Of

Jolene Bossard
Utilities Compliance Investigator
Idaho Public Utilities Commission

EDUCATION

Ms. Bossard graduated with honors from the College of Western Idaho (CWI) in 2013 with a dual Associate of Applied Science (AAS) degree in Accounting and Administrative Support. She was a member of the Phi Theta Kappa honor society and did her internship working as an admin in the president's office of CWI.

BUSINESS EXPERIENCE

Prior to joining the Idaho Public Utilities Commission (IPUC), Ms. Bossard had twenty-nine years' experience working in private industry for Hewlett Packard in a variety of positions. In the 1980's, the positions included lamination, electroless, photo lab, and process mechanic in the fabrication of printed circuit boards. She was also trained for the chemical emergency response team. The rest of her career was working as a New and Current Technical Product/Process Specialist in the Storage Division. In that capacity, she was an expert in life cycle related activities and support in systemic transactions.

Ms. Bossard was responsible for assisting engineering teams, marketing, procurement, and manufacturing in setting up, implementing, and coordinating change to manufacturing processes and products on a worldwide basis. In addition, she was responsible for developing and documenting systems, processes, investigating issues, collecting data, managing documentation, and communicating/coordinating change between multiple world-wide organizations in support of the life cycle activities.

Ms. Bossard joined the Idaho Public Utilities Commission in 2014 as a Utilities Compliance Investigator. For almost 9 years she has investigated and facilitated conflict resolution between customers and utilities in accordance with Utility Customer Relations Rules and Idaho State Statutes by interviewing consumers to determine and discuss the basis of their disputes,

suggest equitable solutions, and mediate disputes between consumers and utilities or negotiate with utilities on behalf of consumers. In addition, she works with agencies in helping customers in financial crises procure funding to help pay their utility bills.

She has also participated in a variety of cases before the Commission with the responsibility of advocating on the consumers behalf by reviewing issues from previous cases, reviewing previous complaints, reviewing submitted comments from customers, and investigating consumer issues raised in the case. She also reviews the company's customer facing documentation, including notices and press releases.

Veolia Water
Complaint & Inquiry Totals
2020 - 2022

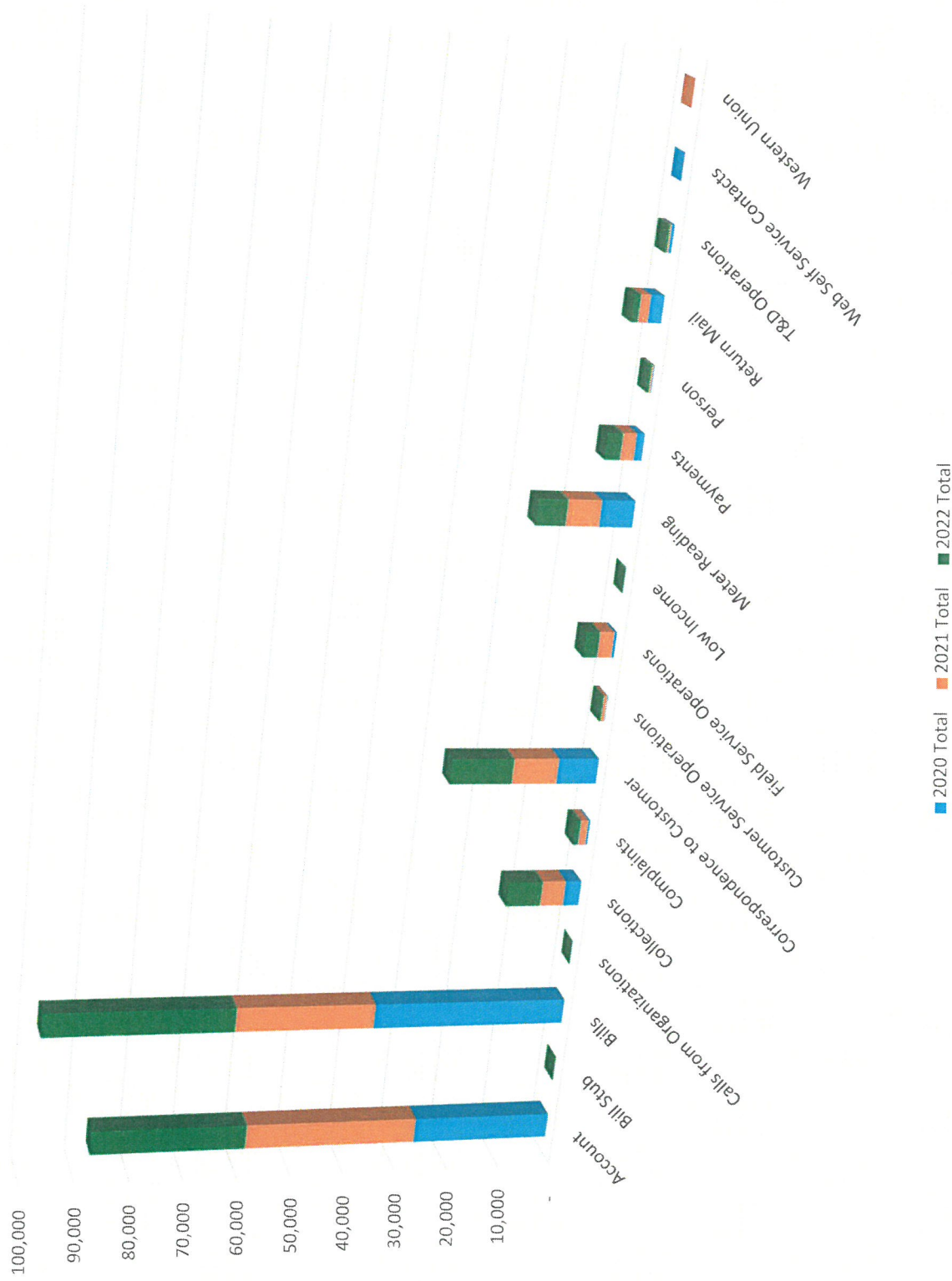
	2020	2021	2022	Total
<i>Credit and Collection</i>	6	5	18	29
<i>Line Extension/Installation</i>	6	5	3	14
<i>Service Outage/Repair</i>	6	7	13	26
<i>Billing</i>	15	9	36	60
<i>Rates/Policies</i>	25	22	29	76
<i>All Other</i>	17	14	15	46
<i>Total Complaints and Inquiries</i>	75	62	114	251

Exhibit No. 137
Case No. VEO-W-22-02
J. Bossard, Staff
02/15/22

Veolia's Average Speed of Answer (ASA)	
ASA (Seconds)	Period
20	20-Jan
43	20-Feb
26	20-Mar
14	20-Apr
11	20-May
28	20-Jun
26	20-Jul
38	20-Aug
25	20-Sep
29	20-Oct
36	20-Nov
24	20-Dec
13	21-Jan
14	21-Feb
16	21-Mar
14	21-Apr
13	21-May
23	21-Jun
42	21-Jul
29	21-Aug
13	21-Sep
13	21-Oct
26	21-Nov
22	21-Dec
19	22-Jan
12	22-Feb
15	22-Mar
13	22-Apr
23	22-May
23	22-Jun
37	22-Jul
75	22-Aug
170	22-Sep
140	22-Oct
59	22-Nov

Exhibit No. 138
Case No. VEO-W-22-02
J. Bossard, Staff
02/15/22

Call Center Calls / Emails



Month	2020				2021				2022			Total	
	Customer who got Veolia Cares	Amount Paid	Customers subsequently disconnected	Customer who got Veolia Cares	Amount Paid	Customers subsequently disconnected	Customer who got Veolia Cares	Customers subsequently disconnected	Customer who got Veolia Cares	Total Amount	Customers subsequently disconnected	Count of customers who received Veolia Cares	Amount Paid
1	16	\$1,160.02		23	\$1,589.96		6		6	\$505.07	1	45	\$3,255.05
2	17	\$1,068.36	1	21	\$1,573.62		6		6	\$463.70		44	\$3,105.68
3	8	\$510.41		14	\$890.80		6		6	\$394.99		28	\$1,796.20
4	9	\$494.74		5	\$365.65		5		5	\$413.00		19	\$1,273.39
5	1	\$75.00		8	\$571.43	1	2		2	\$157.64		11	\$804.07
6	10	\$671.47		11	\$827.55	1	4		4	\$301.17		25	\$1,800.19
7	11	\$783.68		17	\$1,393.35		7		7	\$513.45		35	\$2,690.48
8	28	\$1,981.37		15	\$1,213.89	1	2		2	\$124.28		45	\$3,319.54
9	29	\$2,103.40		26	\$2,006.84	3	3		3	\$255.00		58	\$4,365.24
10	30	\$2,250.00		19	\$1,615.00	1						49	\$3,865.00
11	38	\$2,753.13		31	\$2,483.48		7		7	\$487.15		76	\$5,723.76
12	27	\$1,910.86		10	\$848.72		1		1	\$85.00		38	\$2,844.58
Grand Total	224	\$15,762.44	1	200	\$15,380.29	7	49		49	\$3,700.45	1	473	\$34,843.18

Exhibit No. 140
Case No. VEO-W-22-02
J. Bossard, Staff
02/15/22

FLUSHING CREDIT BASED ON DATE CREDIT APPLIED

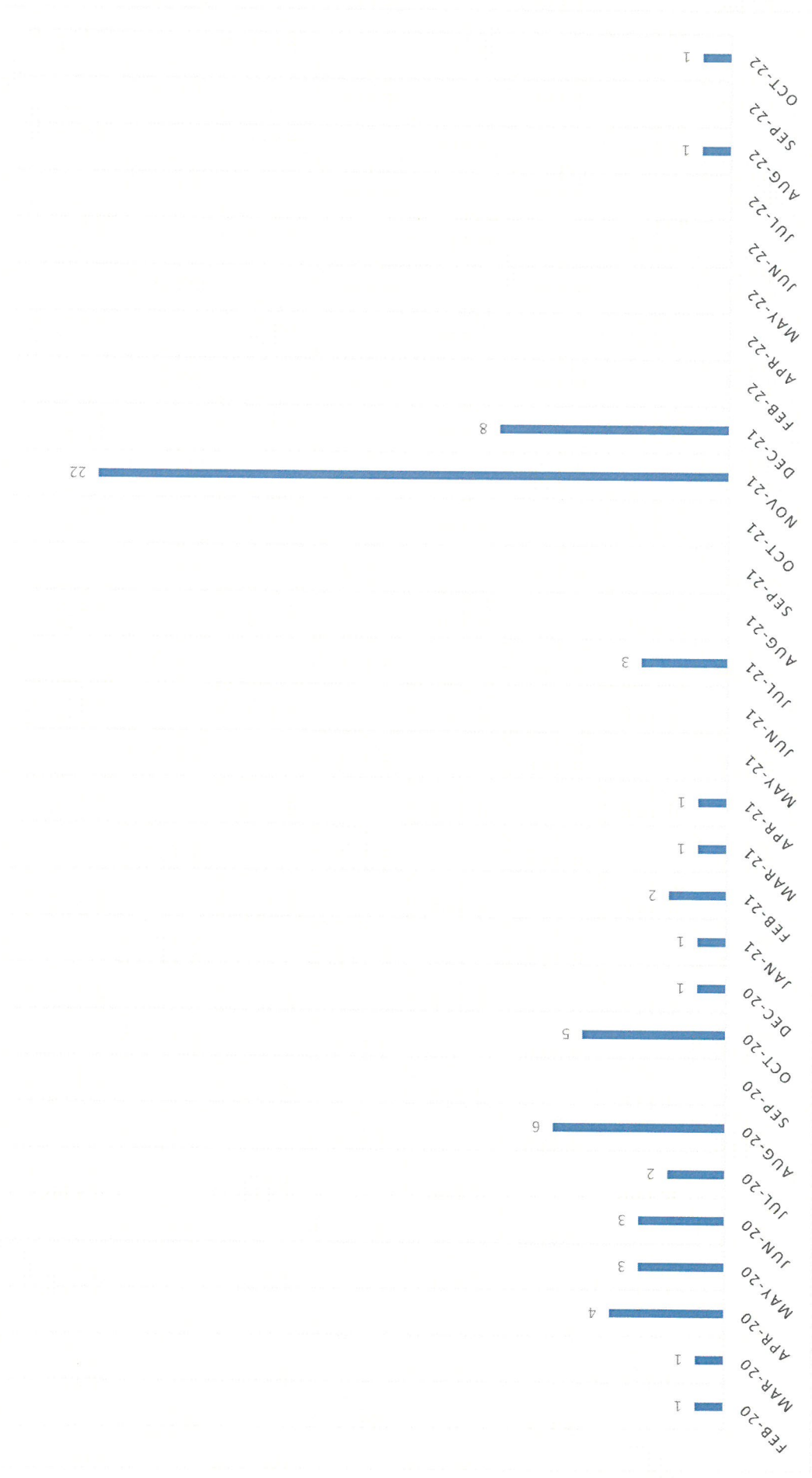


Exhibit No. 141
Case No. VEO-W-22-02
J. Bossard, Staff
02/15/22

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 15TH DAY OF FEBRUARY 2023, SERVED THE FOREGOING **DIRECT TESTIMONY OF JOLENE BOSSARD**, IN CASE NO. VEO-W-22-02, BY E-MAILING A COPY THEREOF, TO THE FOLLOWING:

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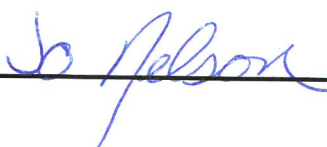
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CERTIFICATE OF SERVICE