



QUALITY OF SERVICE STANDARDS

ANNUAL PERFORMANCE REPORT 2015

ELECTRICITY TRANSMISSION AND DISTRIBUTION SECTOR

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EXECUTIVE SUMMARY

The Regulated Industries Commission (RIC) is a statutory body established under the Regulated Industries Commission Act No. 26 of 1998. Section 6 of the Act mandates the RIC to prescribe standards of service, monitor compliance, and impose sanctions for non-compliance. In order to fulfil this mandate, the RIC implemented the Quality of Service Standards (QSS) for the Electricity Transmission and Distribution Sector.

This is the Twelfth Annual Performance Report on the QSS and it presents an analysis of the performance of the Trinidad and Tobago Electricity Commission (T&TEC) with respect to the Standards for 2015. The report examines and assesses the performance of T&TEC in each of the Guaranteed and Overall Standards and compares the performance for 2015 with that of the previous year, where applicable. The information utilized in this report has been supplied by T&TEC.

Summary of Performance: Guaranteed Standards

Guaranteed Standards are those that set service levels which must be met by the service provider for every individual customer. Under these standards, the utility is required to make compensatory payments to affected customers if it fails to provide the level of service stipulated. There are eight guaranteed standards for T&TEC, and all but the first (GES 1) carry automatic compensatory payments for breaches¹ of the guaranteed standards.

Generally, T&TEC's performance improved in 2015, as evidenced by the 77% reduction in the number of breaches against the number recorded in 2014. This improvement is attributed to the significant reduction (78%) in the number of breaches occurring under Guaranteed Standard, GES 1, (Response and Restoration Time). However, GES 1 still accounts for the largest number of breaches in 2015 (1,524 breaches), which is 96% of the total number of breaches. In descending order of magnitude, eighteen breaches occurred under both GES 7 (New connection of supply) and GES 8 (Payments owed under Guaranteed Standards), followed by eleven breaches under GES 3 (Reconnection). There were nine breaches under GES 5 (Investigation of

¹A breach occurs for each incidence of non-compliance of the stipulated level of performance for a standard by the service provider.

Voltage Complaints), and eight under GES 2 (Billing Punctuality). GES 4 (Making and Keeping Appointments) and GES 6 (Responding to Billing and Payment Queries) were the only two standards for which no breaches were recorded in 2015. Generally, compliance rates were maintained at the previous levels across all the standards. A summary of the performance under the Guaranteed Standards is presented below in table ES1.

Table ES1 - Compliance under Guaranteed Standards, 2015

Code	Service Description	Performance Measure	2015 Compliance Rates (%)	2014 Compliance Rates (%)
GES1	Response and Restoration Time after unplanned (forced) outages on the distribution system.	Time for restoration of supply to affected customers - within 10 hours	99.90	99.5
GES2	Billing Punctuality (new customers)	Time for first bill to be mailed after service connection: (a) Residential – within 60 days (b) Non-Residential –within 30 days	99.96 96.90	99.1 98.6
GES3	Reconnection After Payment of Overdue Amounts or Agreement on Payment Schedule	Time to restore supply after payment is made - within 24 hours	99.96	99.9
GES4	Making and Keeping Appointments	Where required, appointments will be made on a morning or afternoon basis	100.0	100.0
GES5	Investigation of Voltage Complaints	(i) Response - All voltage complaints to be responded to within 24 hours.	99.9	99.7
		(ii) Rectification- All voltage complaints to be rectified within 15 working days.	99.7	99.1
GES6	Responding to Billing and Payment Queries.	Substantive reply within 15 working days.	100.0	100.0
GES 7	New Connection of Supply	Service drop and meter to be installed within 3 working days.	99.9	99.8
GES 8	Payments Owed under Guaranteed Standards	Time to credit compensatory payment: (i) Residential – within 30 working days (ii) Non-Residential – within 60 working days	0.0 N/A	1.0 N/A

N/A – Not Applicable

T&TEC has not been able to identify the individual customers who experienced breaches under GES 1 due to limitations with its outage management system. T&TEC is aware of the geographical areas of the outages and provides estimations of the number of affected customers based on the estimated number of customers who receive supply within these areas. Hence customers are still required to submit claims for breaches under this standard. The RIC estimates that at least \$95,388 would have been due in compensatory payments to customers, if claims were submitted/processed for all the actual and estimated breaches that occurred in 2015. Table ES2 provides a breakdown of the number of breaches and the estimated minimum level of compensatory payments.

Table ES2 – Details of Breaches and Estimated Amount of Compensatory Payments due under the Guaranteed Standards, 2015

Standard	Details of Breaches	Minimum
		Payment Due (\$)
GES 1	(Estimated) 1,524 outage incidents not restored on time out of 1,558,029 outage incidents	91,440
GES 2	8 new bills not issued on time out of 11,531bills	400
GES 3	11 reconnections not completed on time out of 8,093 reconnections	1,298
GES 4	0 appointments not met on time out of 1,229 appointments	0
GES 5	9 voltage complaints not rectified on time out of 2,931 voltage complaints	450
GES 6	0 queries not resolved out of 21,224 queries	0
GES 7	18 new connections not completed on time out of 13,630 connections	900
GES 8	18 payments not made out of 47 payments owed	900
TOTAL	1,588 breaches	95,388

Summary of Performance: Overall Standards

The seven overall standards cover areas of service where it is not appropriate or feasible to give individual guarantees, but where the expectation of the stakeholders is that the utility will provide pre-determined minimum levels of service. These standards generally relate to the reliability of service affecting a group of customers. Compliance rates for T&TEC's performance under the overall standards in 2015 are presented in table ES3.

Table ES3 - Compliance under Overall Standards, 2015

Code	Description	Required Performance Units	2015 Compliance Rate (%)	2014 Compliance Rate (%)
OES1	Frequency of Meter Reading	(a) 90% of industrial meters should be read every month	100.0	100.0
		(b) 90% of residential and commercial meters read according to schedule	100.0	100.0
OES2	Billing Punctuality	98% of all bills to be mailed within ten (10) working days after meter reading or estimation	100.0	100.0
OES3	Responding to Meter Problems	Visit or substantive reply within 10 working days 95% of the time.	94.7	87.6
OES4	Prior Notice of Planned Outages	3 days advance notice of planned outages 100% of the time	96.9	91.2
OES5	Street Lights Maintenance	Street Lights- within 7 working days	40.5	50.1
		Highway Lights – within 14 working days	88.5	85.6
OES6	Response to Customer Queries/Requests (written)	Time to respond after receipt of queries. Initial Response – within 10 working days	84.2	95.2
	,	Final Position – within 30 working days	45.9	34.8
OES7	Notifying Customers of Receipt of Claim under Guaranteed Standard GES 1	100% of customers to be notified of receipt of claim within 10 working days.	N/A	100.0

Generally there was no significant improvement in T&TEC's performance under the overall standards. As was the case in 2014, T&TEC achieved full compliance under OES 1 (Frequency of Meter Reading), OES2 (Billing Punctuality) and OES 7 (Notifying Customers of Receipt of Claim under Guaranteed Standard GES 1). There was marginal improvement in the performance

under OES 3 (Responding to Meter Problems), OES 4 (Prior Notice of Unplanned Outages) and the final position under OES 6. However, there was a decline in performance under the initial response of OES6. Performance under OES 5 (Street Lights Maintenance) worsened for street light maintenance and improved for highway lights maintenance.

Although T&TEC now has a department dedicated to regulatory affairs, there were several staff changes during the year. This adversely affected the timeliness of submissions of quarterly data as well as the response time to requests for validation of data. T&TEC must continue to improve the existing mechanisms for the transfer of information among its departments to ensure that timely and accurate data is delivered to the RIC.

SECTION 1 INTRODUCTION

The RIC is responsible for establishing rates, setting service standards and monitoring performance of service providers in the electricity, and water and wastewater sectors. Monitoring the quality of service is an important element in the regulatory framework, since it serves to protect the interests of customers in key service areas. The RIC is empowered under Section 6 of its Act to prescribe standards of service for the service providers under its purview, and to impose sanctions for non-compliance. Consequently, the Quality of Service Standards (QSS) for the Electricity Transmission and Distribution Sector were implemented on April 7th, 2004. These standards were subsequently revised and the new standards were implemented from April 2010. This is the twelfth Annual Performance Report on the QSS for the Electricity Transmission and Distribution Sector. The data used in this report have been supplied by T&TEC.

1.1 Purpose of Document

The purpose of this report is to present an analysis of the performance of T&TEC with respect to the QSS for 2015. The data has been disaggregated either on a monthly and quarterly basis in order to illustrate performance trends throughout the year. The report is intended to inform the public and other stakeholders about the performance of T&TEC.

1.2 Structure of Document

The remainder of this document is structured as follows:

- In Section 2, the performance of T&TEC under each of the eight guaranteed standards is presented;
- Section 3 deals with the performance of T&TEC under each of the seven overall standards;
- Section 4 deals with the issue of compensatory payments;
- The summary and conclusion of the report are presented in Section 5; and
- In Appendix 1, tables of the guaranteed and overall standards and the compensatory payment levels for the guaranteed standards are presented.

SECTION 2 PERFORMANCE REVIEW: GUARANTEED STANDARDS FOR 2015

2.1 Guaranteed Standards

Guaranteed standards set service levels that must be met by the service provider for every individual customer. Under these standards, the utility is required to make compensatory payments to affected customers if it fails to provide the level of service stipulated.

There are eight guaranteed standards, and all but the first (GES 1) carry automatic compensatory payments for breaches² of the guaranteed standards. The performance of the service provider in 2015 for each of these standards is now reviewed.

GES 1: Response and Restoration Times of Supply.

This standard was designed to hold T&TEC accountable for its response to restoring the supply to customers in the event of an unplanned outage. It seeks to ensure that T&TEC responds promptly to any unplanned outage and restores supply in the shortest time possible. Accordingly, this standard requires that supply be restored to affected customers within 10 hours after an unplanned outage on the distribution system.

In analysing T&TEC's performance under GES 1, the RIC examined the number of unplanned outages that occurred in the system, to quantify the number of times a response was required from the service provider.

There were 8,678 unplanned outages recorded in 2015, which is equivalent to an average of 24 unplanned outages per day across T&TEC's network. This was similar to the average observed in 2014. The breakdown of the unplanned outages in terms of Distribution Areas is shown in table 1.

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²A breach occurs for each incidence of non-compliance of the stipulated level of performance for a standard by the service provider.

Table 1 – No. of Unplanned Outages, 2015

Area	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	TOTAL (2015)	TOTAL (2014)
North	273	176	182	236	236	267	248	235	215	349	263	225	2905	2,860
South	242	177	225	234	210	242	254	251	268	236	202	194	2735	2,638
Tobago	77	66	93	74	88	119	142	130	117	123	25	81	1135	1,132
East	77	13	18	7	14	4	2	92	68	78	73	90	536	1,279
Central	91	89	47	171	125	138	112	109	104	121	141	119	1367	844
TOTAL (2015)	760	521	565	722	673	770	758	817	772	907	704	709	8678	
TOTAL (2014)	697	665	697	604	617	538	770	847	898	965	754	701		8,753

Unplanned outages occur for varying reasons and durations. In keeping with the performance requirements of this standard, which state that supply should be restored within 10 hours, T&TEC reports on the outages that exceed the 10 hour limit set by the RIC. There were 70 unplanned outages for which restoration took longer than 10 hours. Of these, 23 were as a result of a Tropical storm which occurred in Tobago on the 8th October. The breakdown of the outages in excess of ten hours in terms of Distribution Areas is shown in table 2.

Table 2 - No. of Unplanned Outages exceeding 10 hours, 2015

Area	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	TOTAL (2015)	TOTAL (2014)
North	0	0	0	0	1	0	1	2	1	6	3	1	15	19
South	2	0	0	0	1	0	0	1	0	0	0	0	4	17
Tobago	0	3	1	0	0	0	1	1	1	23	0	0	30	32
East	2	1	0	2	4	2	1	1	0	2	5	1	21	35
Central	0	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	4	4	1	2	6	2	3	5	2	31	8	2	70	103

Listed below are the reasons provided by T&TEC for the causes of those outages and the frequency in 2015³.

³ It should be noted that there may be multiple reasons listed for a specific outage, hence the sum of bracketed numbers may exceed the number of outages

- Blown transformer fuses and blown high tension (HT) fuses (25),
- Burst HT, low voltage (LV) and neutral conductors/wires (17),
- Reason unknown or not given (14),
- Tree contact resulting in burst wires and/or blown fuses (13),
- Leaning or broken poles (3),
- Defective transformers (3),
- Defective Ring Main Unit and cable termination (2), and
- Vehicular accident (1).

As in 2014, the most common cause of outages in 2015 was blown fuses in part attributable to tree contact and fallen trees. This supports the assertion that there is the need for proper vegetation management within the sphere of network maintenance. Previously, the RIC had observed discrepancies in the outage reports submitted by the different Distribution Areas. While there has been marginal improvement in the reporting, T&TEC still needs to standardise the collection and reporting of this information across the Distribution Areas.

It should be noted that for some of the 70 outages that exceeded 10 hours, the delay in restoration was caused by either a combination of events or it was difficult to clearly ascertain the reason for the delayed restoration. T&TEC supplied the following reasons for the lengthy restoration times in 2015:

- Inclement weather (30),
- Remote location, poor access to site and poor terrain (13),
- Further service crews required. e.g. Daylight crew, line clearing and tree trimming required (10),
- High number of trouble reports (10),
- Awaiting appropriate equipment to conduct repairs (8),
- Reason unknown or not given (4),
- Transportation issues (3),
- Bee infestation (3),
- Bush fire (1)
- Complexity of the job (2),
- Unusually heavy traffic (1),

- Security issues or high risk areas (1), and
- Awaiting customer (1).

An unplanned outage affects many customers at the same time and in the case of the individual customer is referred to as an outage incident. Each instance in which the electricity supply to the individual customer is not restored within 10 hours of the unplanned outage is considered as a breach of GES 1. Additionally, a second and third breach is registered when the supply is not restored within 22 hours and 34 hours respectively.

Table 3 shows the estimated number of customer outage incidents and the estimated number of customers not restored within the specified time frames of 10 hours, 22 hours and 34 hours, resulting in breaches of GES 1.

Table 3 - Customer Outage Incidents exceeding 10 hours, 2015

Item	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	TOTAL (2015)
No. of customer outage incidents	99,570	53,810	113,270	139,406	132,763	160,544	110,065	118,177	104,516	173,391	190,805	161,712	1,558,029
No. of customers not reconnected within 10 hours	37	31	12	28	111	19	429	56	28	459	169	26	1,405
No. of customers not reconnected within 22 hours	0	19	12	0	0	0	0	1	8	73	1	0	114
No. of customers not reconnected within 34 hours	0	4	0	0	0	0	0	0	0	1	0	0	5
Total No. of Breaches	37	54	24	28	111	19	429	57	36	533	170	26	1,524
Percentage non- compliance (%)	0.04	0.10	0.02	0.02	0.08	0.01	0.39	0.05	0.03	0.31	0.09	0.02	0.10
Compliance Rate (%)	99.96	99.90	99.98	99.98	99.92	99.99	99.61	99.95	99.97	99.69	99.91	99.98	99.90

The total number of customer outage incidents increased from 1,298,054 in 2014 to 1,558,029 to 2015. However, the number of breaches decreased from 6,961 to 1,524. This is represented in table 4. Of the 1,524 breaches experienced during 2015 by 1,405 customers, only one customer filed a claim.

Table 4 - Response and Restoration Times of Supply, 2015

Item	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	TOTAL 2015	TOTAL 2014
Total no. of customer outage incidents>10 hours (Breaches)	115	158	522	729	1,524	6,961
No. of customer outage incidents	266,650	432,713	332,758	525,908	1,558,029	1,298,054
Percentage non-compliance (%)	0.04	0.04	0.16	0.14	0.1	0.5
Compliance Rate (%)	99.96	99.96	99.84	99.86	99.9	99.5

GES 1 continues to be the standard with the largest estimated number of breaches and has the lowest number of claims. The Outage Management System (OMS) module of the Advanced Metering Infrastructure (AMI), which will facilitate the automated identification of the individual customers affected by outages and consequently the automatic processing of all breaches occurring under GES 1, is currently in its pilot stage. T&TEC has indicated that full implementation of this module is expected to be completed by the fourth quarter of 2016.

GES 2: Billing Punctuality (New customers).

This standard seeks to ensure a prompt and efficient billing process for new customers. After a new service connection is made, the standard requires that the first bill be mailed to residential customers within 60 days, and to non-residential customers within 30 days.

There were 11,433 new residential customers connected to supply in 2015, which represented a 28% increase over 2014. Of these, bills were not mailed to five customers (0.04%) within the stipulated period. T&TEC was able to maintain its performance under this standard at 99.9% (See table 5).

Table 5 - Billing Punctuality for Residential Customers, 2015

Item	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter	TOTAL 2015	TOTAL 2014
No. of new Residential customers requesting supply	2,255	3,021	3,152	3,005	11,433	8,932
No. of bills not mailed within 60 days	1	1	2	1	5	6
Percentage Breach (%)	0.04	0.03	0.06	0.03	0.04	0.07
Compliance Rate (%)	99.96	99.97	99.94	100.0	99.96	99.93

There was a 40% increase in the number of non-residential customers connected to supply in 2015. Of the 98 customers, bills were not mailed to three of them within the stipulated time. Full compliance was achieved in the first quarter only. Performance during the second, third and fourth quarters fluctuated, resulting in an overall compliance rate of 96.9% for 2015 (See table 6).

Table 6 - Billing Punctuality for Non-Residential Customers, 2015

Item	1 st	2 nd	3 rd	4 th	TOTAL	TOTAL
Telli	Quarter	Quarter	Quarter	Quarter	2015	2014
No. of new Non-						
Residential customers	19	22	35	22	98	70
requesting supply						
No. of bills not mailed	0	1	1	1	3	1
within 30 days (breach)	U	1	1	1	3	1
Percentage Breach (%)	0.0	4.55	2.86	4.55	3.06	1.43
Compliance Rate (%)	100.0	95.45	97.14	95.45	96.94	98.57

GES 3: Reconnection after payment of overdue amounts or agreement.

T&TEC disconnects customers for the non-payment of arrears. Once these have been settled or an agreement has been reached on a payment schedule, T&TEC is required to restore the service promptly. This standard requires that the reconnection of supply be completed within 24 hours after either full payment of the overdue amount or when the agreement is made.

There was a 15% increase in the number of customers that were disconnected for non-payment of arrears in 2015. Eighty-three percent of these customers made payments or arrangements. As

shown in table 7, the majority of these customers were reconnected within 24 hours and the compliance rate remained relatively high for this standard.

Table 7 - Reconnection after Payment of Overdue Amounts or Agreement, 2015

Item	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter	TOTAL 2015	TOTAL 2014
Total Disconnections	9,494	8,999	8,158	7,366	34,017	29,472
Customers making payments/arrangements	6,959	7,478	7,065	6,591	28,093	25,758
No. not reconnected within 24 hours	3	6	1	1	11	23
Percentage Breach (%)	0.04	0.08	0.01	0.02	0.04	0.09
Compliance Rate (%)	99.96	99.92	99.99	99.98	99.96	99.91

GES 4: Making and Keeping Appointments.

It is sometimes necessary for T&TEC to make appointments to visit customers' premises. In the event that the appointment made by T&TEC is not kept, it is the customer who experiences greater inconvenience. The standard requires that notice of inability to keep appointments be given to customers at least 24 hours before the appointment. There is non-compliance with the standard if an appointment is not kept within 1 hour of the specified time.

There were 1,229 appointments made in 2015. Of these, seventeen were cancelled with 24 hours notice being given, and the remainder were kept within 1 hour of the appointed time. Full compliance with this standard was achieved for all the quarters of 2015 (See table 8).

Table 8 - Making and Keeping Appointments, 2015

Item	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter	TOTAL 2014	TOTAL 2014
No. of appointments arranged with customers	220	290	420	299	1,229	1,055
No. of appointments not kept within 1hr of appointed time	0	0	0	0	0	0
No. of appointments cancelled or postponed with 24 hours notice	0	0	13	4	17	22
Percentage Breach (%)	0.0	0.0	0.0	0.0	0.0	0.0
Compliance Rate (%)	100.0	100.0	100.0	100.0	100.0	100.0

GES 5: Investigation of Voltage Complaints

T&TEC is governed by the Electricity Supply Rules made under Section 15 of the Electricity (Inspection) Act Chapter 54.72 to supply its customers at specified voltage levels, where the supply voltage level shall not vary beyond six percent above or below the nominal supply voltage. When a customer reports that the electricity supply is outside the permitted voltage range, T&TEC determines whether a visit is required based on the current conditions of the electricity network and must visit within 24 hours when necessary. If a problem does exist, T&TEC must rectify the problem within 15 working days. A breach occurs if the service provider fails to visit or correct the problem within the respective periods specified.

The total number of voltage complaints received continued to decrease, with a 19% reduction recorded in 2015. T&TEC determined that 2,742 of the 2,931 complaints received, required a visit and responded to all except four within 24 hours. Under this standard, T&TEC is required to identify which complaints were legitimate voltage complaints after the visit. Of the 2,742 visits made, T&TEC reported that 1,467 or 54% of the complaints were in fact legitimate. Five of these were not rectified within 15 working days. Thus, the overall compliance rate for rectification of voltage complaints in 2015 was 99.7%. The performance is summarized in table 9.

Table 9 - Correction of Low/High Voltage, 2015

Item	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter	TOTAL 2015	TOTAL 2014
No. of voltage complaints received	670	641	804	816	2,931	3,621
No. of complaints where visit was necessary	632	621	762	727	2,742	3,369
No. of complaints not responded to within 24 hours	0	0	3	1	4	9
Percentage Breach	0.0	0.0	0.4	0.1	0.1	0.3
Compliance Rate	100.0	100.0	99.6	99.9	99.9	99.7
No. of legitimate voltage complaints	350	341	416	360	1,467	1,069
No. of complaints not rectified within 15 working days	1	1	2	1	5	10
Percentage Breach	0.3	0.3	0.5	0.3	0.3	0.9

GES 6: Responding to Billing and Payment Queries

This standard states that T&TEC must respond to a customer's billing and payment queries within 15 working days with a substantive response. Failure to do so is considered a breach of the standard.

There was a slight increase in the number of billing and payment queries received in 2015. Of the 21,224 queries received, all were responded to within the specified time frame. Therefore, there continued to be full compliance in each quarter of 2015, as seen in table 10.

Table 10 - Responding to Billing and Payment Queries, 2015

Item	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter	TOTAL 2015	TOTAL 2014
Number of billing and payment queries	5,396	4,943	5,026	5,859	21,224	21,046
Number not responded to within 15 working days	0	0	0	0	0	0
Percentage Breach (%)	0.0	0.0	0.0	0.0	0.0	0.0
Compliance Rate (%)	100.0	100.0	100.0	100.0	100.0	100.0

GES 7: New Connection to Supply

This standard seeks to ensure that new connections to supply are carried out on a timely basis after all necessary paperwork has been completed. It states that T&TEC must complete a new connection to supply within 3 working days after submission of all payments and documentation or by a mutually agreed upon date. In instances where network augmentation works are required, the aforementioned stipulation will apply from the date of completion of such works.

There were 13,630 requests for new connections in 2015, which represented a 13% increase over 2014. Of these, eighteen were not made within the specified time. This resulted in an annual compliance rate of 99.9% (See table 11).

Table 11 - Connection to Supply, 2015

Item	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter	TOTAL 2015	TOTAL 2014
No. of connection requests	2,975	3,195	4,126	3,334	13,630	12,060
No. of connections not made within 3 working days or by the specified date	3	0	15	0	18	65
Percentage Breach (%)	0.1	0.0	0.4	0.0	0.1	0.5
Compliance Rate (%)	99.9	100.0	99.6	100.0	99.9	99.5

GES 8: Payments owed under Guaranteed Standards

The Guaranteed Standards Scheme, as described in this section, not only sets prescribed levels of service, but also sets penalties for failure to meet these levels. This standard requires that compensatory payment to the customer's account be made within 30 working days for non-residential customers and 60 days for residential customers, after the claim has been accepted by T&TEC. The standard requires T&TEC to pay a further \$50 to any customer whose account is not credited within the specified timeframe.

In respect of GES 1 customers must notify the utility that there was a breach and make a claim for the compensatory payment. For the standards, GES 2 to GES 7, T&TEC should be aware of breaches that have occurred, and is required to automatically process and credit payments to customers' accounts. The information on breaches of GES 8 is presented in table 12.

There was one claim under GES 1 and 64 claims across GES 2 to GES 7 from residential customers. Of these 65 claims, 18 were not paid within the specified time frame, making them eligible for compensation under GES 8. According to the data submitted, none of these 65 customers were compensated, resulting in a compliance rate of 0%.

T&TEC has continued to assure the RIC that these customers are compensated, however, the evidence to support this assurance has not been forth coming. This continues to be an area of poor performance and T&TEC is urged to take every step necessary to rectify same.

 Table 12 - Payments owed under Guaranteed Standards, 2015

Item	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter	TOTAL 2015	TOTAL 2014
Number of Residential claims not paid within 60 working days	0	1	16	1	18	66
Number of Residential claims further compensated for late or non-payment	N/A	0	0	0	0	1
Percentage Breach (%)	N/A	100.0	100.0	100.0	100.0	98.5
Compliance Rate (%)	N/A	0.0	0.0	0.0	0.0	1.5
Number of Non-Residential claims not paid within 30 working days	0	0	0	0	0	0
Number of Non-Residential claims further compensated for late or non-payment	N/A	N/A	N/A	N/A	N/A	N/A
Percentage Breach (%)	N/A	N/A	N/A	N/A	N/A	N/A
Compliance Rate (%)	N/A	N/A	N/A	N/A	N/A	N/A

N/A – Not Applicable

SECTION 3 COMPENSATORY PAYMENTS

The QSS for the Electricity Transmission and Distribution Sector is a guaranteed standards scheme that imposes a penalty on the service provider when the targets set for the guaranteed standards are not met. The quantum of the compensatory payment is intended to incentivize T&TEC without being unduly punitive. T&TEC is required to credit the payment automatically to the customer's account for breaches of the guaranteed standards, except in the case of GES 1. Customers are required to submit a claim for breaches under this standard, as T&TEC is currently unable to identify the individual customers who experienced outages greater than ten hours.

In assessing the effectiveness of the guaranteed standards scheme, the number of breaches must be determined, as well as the payments due for these breaches. There were 1,588 breaches occurring across standards GES 1 to GES 8 that were eligible for compensatory payment. The total amount of compensatory payment due was calculated based on the amount specified by the standard⁴. Based on the number of breaches, the sum of the compensatory payments is estimated to be at least \$95,388. This information is presented in table 13.

Table 13 - Breaches and Payments Due under the Guaranteed Standards, 2015

Standard	Number of Breaches	Penalty Payment (\$)	Minimum Payment Due (\$)
GES 1	1,524	60	91,440
GES 2	8	50	400
GES 3	11	118	1,298
GES 4	0	50	0
GES 5	9	50	450
GES 6	0	50	0
GES 7	18	50	900
GES 8	18	50	900
TOTAL	1,588		95,388

⁴ In the cases where the quantum of the payment varied according to customer category and the category was not distinguished, the lesser value was used in the computation.

T&TEC has reported that only 32 compensatory payments were made to customers, totalling \$2,258, which is 2.4% of the entire estimated amount. This information is presented in table 14.

Table 14 - Breaches, Claims and Payments under the Guaranteed Standards, 2015

Standard	Total Number of Breaches	Total Number of Claims Submitted*/Processed	Total Payments made (\$)
GES 1*	1,524	1	60
GES 2	8	8	400
GES 3	11	11	1,298
GES 4	0	0	0
GES 5	9	7	350
GES 6	0	0	0
GES 7	18	3	150
GES 8	18	2	0
Totals	1,588	32	2,258

^{*}Claims under GES 1 must be submitted by customer before they can be processed, while claims under GES2 –GES 8 are generated automatically.

With respect to the automatic compensation, T&TEC paid \$2,198 (56%) of the \$3,948 due. The systems involved in processing these compensatory payments still need to be revised and improved.

Automatic compensation for GES 1 is expected to commence once the Outage Management System is successfully implemented. T&TEC has indicated that a pilot programme has been implemented in one of its Distribution Areas and full roll-out is expected to be completed by the end of 2016.

SECTION 4 PERFORMANCE REVIEW: OVERALL STANDARDS FOR 2015

4.1 Overall Standards

Overall standards are those standards which cover areas of service where it is not appropriate or feasible to give individual guarantees, but where the expectation is that the utility will provide pre-determined minimum levels of service. These standards generally relate to the reliability of service affecting a group of customers. There are seven such standards in place for T&TEC.

OES 1: Frequency of Meter Reading.

This standard aims to have all meters read when scheduled. The performance measures are as follows:

- 90% of all residential and commercial meters read when scheduled, and
- 90% of all industrial meters read every month.

As at the end of 2015, there were 457,926 residential and commercial meters installed. These meters are scheduled to be read six times per year. T&TEC was able to complete 98% of the 2,706,575 scheduled readings for residential and commercial meters as shown in table 15. This is in full compliance with the performance measure of 90% of the meters being read as scheduled.

Table 15 - Frequency of Meter Reading, Residential and Commercial, 2015

Item	1 st	2nd	3rd	4th	TOTAL	TOTAL
	Quarter	Quarter	Quarter	Quarter	2015	2014
No. of residential and						
commercial meters installed at	449,589	452,205	455,404	457,926	457,926	447,102
end of period						
No. of scheduled readings for						
residential and commercial	750,705	596,662	685,437	673,771	2,706,575	2,652,573
meters						
No. of residential and						
commercial meters readings	739,384	577,165	674,226	657,725	2,648,500	2,609,839
completed according to schedule						
Percentage of residential and						
commercial meters read	99%	96%	98%	98%	98%	98%
according to schedule						
Percentage breach (%)	0.0	0.0	0.0	0.0	0.0	0.0
Compliance Rate (%)	100.0	100.0	100.0	100.0	100.0	100.0

The number of industrial meters installed increased from 3,586 at the end of 2014 to 3,730 at the end of 2015, similar to the rate of increase that occurred in 2014. (See table 16). T&TEC complied with the standard in every quarter of 2015, with performance always above the required level of 90% of meters being read every month, resulting in 100% compliance for 2015.

Table 16 - Frequency of Meter Reading, Industrial, 2015

Itom	1 st	2 nd	3rd	4th	TOTAL	TOTAL
Item	Quarter	Quarter	Quarter	Quarter	2015	2014
No of industrial meters at end of period	3,622	3,647	3,695	3,730	3,730	3,586
No. of scheduled readings for industrial meters	10,828	10,908	11,026	11,151	43,913	42,176
No. of actual readings for industrial meters	10,035	10,471	10,205	10,564	41,275	41,116
Percentage of industrial meter readings	93%	96%	93%	95%	94%	98%
Percentage breach (%)	0.0	0.0	0.0	0.0	0.0	0.0
Compliance Rate (%)	100.0	100.0	100.0	100.0	100.0	100.0

OES 2: Billing Punctuality.

T&TEC's customers are billed by cycles in each of its five Distribution Areas. Bills are mailed to the customers in the respective cycles after the meters have been read or estimated according to the schedule. This standard seeks to ensure timely billing and requires that 98% of all bills be mailed to customers within ten working days after meter reading or estimation. T&TEC mailed all bills within the stipulated time frame, resulting in 100% compliance under this standard (See table 17).

Table 17 - Billing Punctuality, 2015

Item	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter	TOTAL 2015	TOTAL 2014
No. of meters read and estimated	749,419	587,636	683,782	668,289	2,689,126	2,652,731
No. of bills not mailed within 10 working days	0	0	0	0	0	0
No. of bills mailed within 10 working days	749,419	587,636	683,782	668,289	2,689,126	2,652,731
Percentage of bills mailed within 10 working days (%)	100	100	100	100	100	100
Percentage breach (%)	0.0	0.0	0.0	0.0	0.0	0.0
Compliance Rate (%)	100.0	100.0	100.0	100.0	100.0	100.0

OES 3: Responding to Meter Problems

Properly functioning meters are important for accurately registering a customer's consumption. The Overall Standard, OES 3, requires that T&TEC responds to customers' meter problems within 10 working days, 95% of the time, either by visiting the premises or with a substantive response.

There were 2,140 reports of meter problems received in 2015 as shown in table 18. The average compliance was 94.7%, an improvement on the 87.6% compliance rate achieved in 2014.

Table 18 - Response to Meter Problems, 2015

Item	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter	TOTAL 2015	TOTAL 2014
No. of meter problems reported	706	377	592	465	2,140	2,716
No. of meters problems not responded to within 10 working days	50	3	147	17	217	457
Percentage responded to within 10 working days (%)	93	99	79	96	90	83.2
Percentage breach (%)	2.0	0.0	24.8	0.0	5.3	12.4
Compliance Rate (%)	98.0	100.0	75.2	100.0	94.7	87.6

OES 4: Prior Notice of Planned Outages.

T&TEC routinely performs maintenance or repair work on the transmission and distribution system, which may involve the interruption of supply. This standard requires T&TEC to give at least three days advance notice of planned outages to customers as a courtesy for the inconveniences that might arise.

There were 1,482 planned outages for the year. Of these, 46 were planned outages for which three days advance notice was not given. T&TEC's performance improved from 2014, with the average compliance rate increasing from 91.2% to 96.9% (See table 19). There were 28 occasions when the duration of the planned outages exceeded the specified time.

Table 19 - Notice of Planned Outages, 2015

Item	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter	TOTAL 2015	TOTAL 2014
No. of planned outages	388	365	433	296	1,482	1,589
No. of planned outages for which 3 days advance notice was not given	19	14	4	9	46	140
Percentage Breach (%)	4.9	3.8	0.9	3.0	3.1	8.8
Compliance Rate (%)	95.1	96.2	99.1	97.0	96.9	91.2
No. of occasions the duration of planned outage exceeded specified time	1	0	27	0	28	14

OES 5: Street Lights Maintenance

OES 5 requires T&TEC to repair 100% of failed streetlights (except highway lights) under its control, within seven working days after receiving notification. T&TEC is also required to establish a monthly schedule to monitor highway lighting and must repair 100% of failed highway lighting within fourteen days after a surveyed or reported failure. Street lighting plays an important role at ensuring the safety of the general public at night. T&TEC, therefore, has an obligation to ensure that they are functioning effectively.

The number of reports of failed street lights increased by 7% during 2015. Of the 28,531 reported failures, T&TEC was able to repair 40.5% of them within the specified time frame (See table 20). This continues to be far below the acceptable/desirable level of performance. The RIC continues to express its concern since this performance impacts the welfare of the public.

Table 20 - Street Lights Maintenance, 2015

Item	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter	TOTAL 2015	TOTAL 2014
No. of failed street lights reported	9,827	7,104	6,560	5,040	28,531	26,461
No. of failed street lights not repaired within 7 working days	3,885	4,815	4,042	4,230	16,972	13,193
Percentage breach (%)	39.5	67.8	61.6	83.9	59.5	49.9
Compliance Rate (%)	60.5	32.2	38.4	16.1	40.5	50.1

There were 14% fewer reports of highway light failures, with the numbers declining from 2,202 in 2014 to 1,898 in 2015. The annual compliance rate for repairs to highway lights was 88.5% in 2015, in which 219 of these fixtures were not repaired within 14 working days (See table 21).

Table 21 - Highway Lights Maintenance, 2015

Item	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter	TOTAL 2015	TOTAL 2014
No. of failed highway lights reported	635	390	344	529	1,898	2,202
No. of failed highway lights not repaired within 14 working days	67	85	27	40	219	538
Percentage breach (%)	10.5	21.8	7.8	7.6	11.5	24.4
Compliance Rate (%)	89.5	78.2	92.2	92.4	88.5	85.6

OES 6: Response to Customer's written Complaints/Requests

This standard is intended to improve the service provider's response to written complaints/requests. Under OES 6, T&TEC is required to:

- (a) Respond to written complaints/requests within 10 working days, and
- (b) Communicate the final position within 30 working days thereafter.

The breaches for each aspect of this standard are shown in table 22. T&TEC received 218 written complaints/requests during 2015, and was unable to respond to 40 of them within 10 working days. This resulted in an annual compliance rate of 81.7%. With respect to having the final position communicated within 30 working days, T&TEC's performance showed marginal improvement, with the average compliance rate increasing from 34.8% in 2014 to 45.9% in 2015.

Table 22 - Response to Customer's written Complaints/Requests, 2015

Item	1 st	2 nd	3 rd	4 th	TOTAL	TOTAL
No. of written complaints/requests received	Quarter 61	Quarter 46	Quarter 63	Quarter 48	2015 218	2014 313
No. of written complaints/requests not responded to within 10 working days (breach)	19	5	11	5	40	15
Percentage Breach (%)	31.1	10.9	17.5	10.4	18.3	4.8
Compliance Rate (%)	68.9	89.1	82.5	89.6	81.7	95.2
No. of written complaints/requests not communicated to with final position within 30 working days (breach)	38	29	23	28	118	204
Percentage Breach (%)	62.3	63.0	36.5	58.3	54.1	65.2
Compliance Rate (%)	37.7	37.0	63.5	41.7	45.9	34.8
No. of written complaints/requests that remain unresolved	176	240	243	266		

OES 7: Notifying customer of receipt of claim under Guaranteed Standard GES 1

This standard requires T&TEC to notify 100% of customers within ten working days of receipt of a claim under guaranteed standard GES 1. There was one claim submitted for a breach of GES 1, and this customer was notified.

Table 23 - Customer Claim Notification, 2015

Item	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter	TOTAL 2015	TOTAL 2014
No. of claims made under GES1	0	0	0	1	1	1
No. of claims not acknowledged within 10 working days	N/A	N/A	N/A	0	0	0
Percentage Breach (%)	N/A	N/A	N/A	0.0	0.0	0.0
Compliance Rate (%)	N/A	N/A	N/A	100.0	100.0	100.0

N/A – Not Applicable

SECTION 5 SUMMARY AND CONCLUSION

5.1 Summary of Performance - Guaranteed Standards

There were 1,588 breaches under the Guaranteed Standards during 2015. This is a significant decrease (77%) on the 7,141 breaches recorded in 2014. The breakdown in the number of breaches is shown in table 24.

Table 24 - Number of Breaches under the Guaranteed Standards by Quarter, 2015

Standa	rd	1 st	2 nd	3 rd	4 th	TOTAL
		Quarter	Quarter	Quarter	Quarter	
GES 1 – Response and	Restoration					
Times of Supply after u	inplanned outages	115	158	522	729	1,524
on the distribution syste	em					
GES 2 – Billing	Residential	1	1	2	1	5
Punctuality	Non- residential	0	1	1	1	3
GES 3 – Reconnection	•	3	6	1	1	11
overdue amount/ agree	ment	3	U	1	1	11
GES 4 – Making and K	Leeping	0	0	0	0	0
Appointments		U	U	U	U	U
GES 5 – Investigation	Response	0	0	3	1	4
of Voltage	Destification	1	1	1	1	5
Complaints	Rectification	1	1	1	1	5
GES 6 – Responding to payment queries	billing and	0	0	0	0	0
GES7- New connection	of supply	3	0	15	0	18
GES8 – Payments owed under	Residential	N/A	1	16	1	18
guaranteed standards	Non- residential	N/A	N/A	N/A	N/A	N/A
TOTA	TOTAL					1,588

As a result of these breaches, 64 customers were eligible for automatic compensation by T&TEC (\$3,948), however, only 31 customers received the automatic credit to their account (\$2,198). Guaranteed Standard GES 1(Response and Restoration time), continues to be the standard with the greatest number of breaches estimated at 1,524, representing 96% of the total number of breaches. Customers are required to file claims for compensation under this standard and only one customer out of the estimated 1,524 customers filed a claim. Therefore, only \$60 out of an estimated sum of \$91,440 was credited to customers' accounts. An inadequate level of compensation to customers continues to be an issue, which should improve when T&TEC is able

to automatically determine the individual customers affected by breaches under GES1 and credit payment to their accounts. This is projected to begin at the end of 2016.

Generally, T&TEC's performance showed some improvement as evidenced by the reduction in the number of breaches that occurred in 2015, however, there are still some areas that can be improved upon. Compliance rates were generally maintained at the previous levels across all the standards. A summary of the compliance rates for the guaranteed standards, 2015 is presented below in table 25.

Table 25 - Summary of Compliance - Guaranteed Standards, 2015

		Compliance Rates (%)						
Standa	ard	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter	TOTAL 2015	TOTAL 2014	
GES 1 – Response and Restoration Times of Supply after unplanned outages on the distribution system		99.96	99.96	98.84	99.86	99.90	99.5	
GES 2 – Billing Punctuality	Residential	100.0	100.0	99.9	100.0	99.96	99.1	
Functuality	Non- residential	100.0	95.5	97.1	95.5	96.90	98.6	
GES 3 – Reconnection after Payment of overdue amount/ agreement		100.0	99.9	100.0	100.0	99.96	99.9	
GES 4 – Making and K Appointments	GES 4 – Making and Keeping Appointments		100.0	100.0	100.0	100.0	100.0	
GES 5 –	Response	100.0	100.0	99.6	99.9	99.9	99.7	
Investigation of Voltage Complaints	Rectification	99.7	99.7	99.5	99.7	99.7	99.1	
GES 6 – Responding to Payment Queries	Billing and	100.0	100.0	100.0	100.0	100.0	100.0	
GES7- New Connection of Supply		99.9	100.0	99.6	100.0	99.9	99.8	
GES8 – Payments Owed Under	Residential	N/A	0.0	0.0	0.0	0.0	1.0	
Guaranteed Standards	Non- residential	N/A	N/A	N/A	N/A	N/A	N/A	

 $N/A-Not\ Applicable$

5.2 Summary of Performance - Overall Standards

Generally there was no significant improvement in T&TEC's performance under the overall standards. As was the case in 2014, T&TEC achieved full compliance under OES 1 (Frequency of Meter Reading), OES2 (Billing Punctuality) and OES 7 (Notifying Customers of Receipt of Claim under Guaranteed Standard GES 1). There was marginal improvement in the performance under OES 3 (Responding to Meter Problems), OES 4 (Prior Notice of Unplanned Outages) and the responding to customer queries with a final position under OES 6. However, there was a decline in performance responding to customer queries with an initial response under OES 6. Performance under OES 5 (Street Lights Maintenance) worsened with regard to street light maintenance but improved with regard to highway lights maintenance. A summary of compliance rates under the overall standards, 2015 is presented in table 26.

Table 26 - Summary of Compliance - Overall Standards, 2015

			Compliance Rates (%)						
Stand	lard	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter	TOTAL 2015	TOTAL 2014		
OES 1 –	Industrial	100.0	100.0	96.3	100.0	100.0	100.0		
Frequency of Meter Reading	Residential and Commercial	100.0	100.0	100.0	100.0	100.0	100.0		
OES 2 – Billing P	unctuality	100.0	100.0	100.0	100.0	100.0	100.0		
OES 3 – Responding to meter problems		98.0	100.0	75.2	100.0	94.7	87.6		
OES 4 – Prior No Outages	OES 4 – Prior Notice Of Planned Outages		96.2	99.1	97.0	96.9	91.2		
OES 5 – Street	Street Lights	60.5	32.2	38.4	16.1	40.5	50.1		
Lights Maintenance	Highway Lights	89.5	78.2	92.2	92.4	88.5	85.6		
OES 6 – Response to Customer	e Initial Response	68.9	89.1	82.5	89.6	81.7	95.2		
Queries/ Requests (written)	Final Position	37.7	37.0	63.5	41.7	45.9	34.8		
OES 7 – Notifying Customer of Receipt of Claim under Guaranteed Standard GES1		N/A	N/A	N/A	100.0	100.0	100.0		

5.3 Conclusion

The Guaranteed Standards Scheme was designed to encourage T&TEC to focus on improving the quality of service delivered in specific areas. In 2015, improvement was observed in T&TEC's performance, as there was a significant reduction in the number of breaches. T&TEC processed 32 (2.0%) of the 1,588 breaches and paid \$2,258 (2.4%) of the minimum compensation of \$95,388 that was due. By comparison, in 2014, T&TEC processed 2.4% of the 2,555 breaches, and paid 0.8% of the minimum compensation due.

This is the sixth year for which there has been automatic compensation for breaches of all the Guaranteed Standards except GES 1. T&TEC's performance with respect to the processing of automatic payments improved from the 26% observed in 2014, and returned to the level observed in 2013. T&TEC paid 68% of the automatic compensatory payments on time. While T&TEC has assured that all affected customers are eventually compensated, there continues to be short-comings in the policies and systems that were instituted to normalize these automatic payments throughout T&TEC's five Distribution Areas.

The Outage Management System (OMS) module of the Advanced Metering Infrastructure (AMI), which will facilitate the identification of all breaches occurring under GES 1, and the consequent automatic compensation to affected customers, is currently in its pilot stage. T&TEC projects that full implementation of this module should occur by the fourth quarter of 2016.

The RIC is engaged in the second revision of the Quality of Service Standards (QSS). It is anticipated that the implementation of this revised QSS will coincide with the full implementation of the OMS module so that automatic compensation under GES 1 can commence. This would ensure that the compensation scheme under the Guaranteed Quality of Standards Scheme is fully realized, thus incentivizing T&TEC to improve its performance and enable customers to receive compensation for poor service.

APPENDIX 1

Table A1 presents a description of the original Guaranteed Standards, the required performance units, and the compensatory payment levels for each standard.

Table A1 - Guaranteed Standards

Code	Service Description	Performance Measure	Required Performance Units	Payments per Customers *
GES1	Restoration of supply after unplanned outage on the distribution system.	Time for restoration of supply to affected customers	Within 10 hours	\$60 (residential) \$600 (non- residential) For each further 12 hr period \$60 (residential) \$600 (non- residential)
GES2	Billing Punctuality .Time for first bill to be mailed after service connection.	Time for first bill to be mailed after service connection: (a) Residential	60 days	\$50 for both residential and non-residential
GES3	Reconnection of service after payment of overdue amounts or agreement on payment schedule	(b) Non-Residential Time to restore supply after payment is made (All customers)	Within 24 hours	Refund of reconnection fee for both residential and non-residential
GES4	Making and keeping appointments	Where required, appointments will be made on a morning or afternoon basis	24 hours notice of inability to keep an appointment with customers.	\$50 for both residential and non-residential
GES5	Investigation of Voltage Complaints	Time to visit, correct problem and notify affected customers	Within 24 hours, Correct within 15 working days.	\$5 0 (residential) \$600 (non- residential)
GES6	Responding to billing and payment queries	Provide a substantive reply	Within 15 working days	\$50 for both residential and non-residential
GES7	New Connection of supply	Service drop and meter to be installed	Within 3 working days	\$50 for both residential and non-residential
GES8	Payments owed under guaranteed standards	Time to credit compensatory payment.	Within 30 working days for non-residential and 60 days for residential.	\$50 for both residential and non-residential

Table A2 presents a description of the original Overall Standards and the required performance units for each standard.

Table A2 - Overall Standards

Code	Description	Required Performance Units
OES1	Frequency of meter reading	a. 90% of industrial meters should be read every month
		b. 90% of residential and commercial meters read according to schedule
OES2	Billing punctuality	98% of all bills to be mailed within ten (10) working days after meter reading or estimation
OES3	Responding to meter problems	Visit or substantive reply within 10 working days 95% of the time
OES4	Prior Notice of planned outages	At least 3 days advance notice of planned outages 100% of the time
OES5	Street lights maintenance.	100% of failed street lights with the exception of highway lighting repaired within 7 working days.
		100% of failed highway lighting repaired within 14 working days.
OES6	Response to customer queries/requests (written)	Substantive response within 10 working days and communicating final position within 30 working days.
OES7	Notifying customers of receipt of claim under guaranteed standard GES1.	100% of customers to be notified of receipt of claim within 10 working days.